



2007 LINKED DEPOSIT BANKING REPORT TO THE MAYOR



CITY OF BOSTON





Prepared May 2009 by NobleAssociates

Cover photos: ©2000, Photos To Go

Disclaimer

The information presented in these reports is not, nor should it be construed as, an assessment of the financial condition of the subject institutions. Neither does any report represent an analysis, conclusion, or opinion of the Treasury Department or NobleAssociates concerning the safety and soundness of a financial institution. The data presented in the reports has been compiled from a number of federal regulatory [and state regulatory] agencies. The data so compiled may not necessarily reflect current activity because of delays resulting from the time required to collect, tabulate and publish the data. While the City and NobleAssociates believe that they have used the most recent data available in the preparation of these reports, because of reporting delays, the data contained herein may not reflect current circumstances. Additionally, statistical data are approximations and generalizations subject to various sources of error inherent in the statistical process, and may be revised on the basis of additional data. The data contained herein describe past activity and are not presented with a view to predicting future results either in particular categories or in general. The sources used by the City and NobleAssociates to compile the data, which are cited herein, should be checked to ensure that the data have not been amended or revised subsequent to the date hereof.



Table of Contents



Table of Contents.....	i
The State of Banking in the City of Boston	1
A Year of Crisis and Action	2
Increased Effectiveness of the CRA	3
The Second Wave.....	3
Continuing Challenges	5
Notes on the Boston MSA	5
2006 Boston MSA Comparative Charts	5
Aggregate Lending Information – HMDA	6
Aggregate Lending Information - Low-Income	7
HMDA and Low-Income Compared against the MD Aggregate Total.....	8
Ratings Summary	1
Summary	2
FDIC Review Schedule	2
OCC and OTS Review Schedule.....	2
Overall Rating	2
Overall and Test Ratings	3
Bank of America	6
Bank of America Overview.....	7
Description	7
Principal Officers.....	7
Chairman, CEO, & President.....	7
CFO	7
Global Compliance Officer	7
Employees	7
Branches	7
CRA Rating	7
Discussion	8
Lending Test.....	8
General Responsiveness to Credit Needs	8
Responsiveness to Low- and Moderate-Income Credit Needs	8
Innovative or Flexible Lending Practices	8
Leadership in Community Development Loans	9
Investment Test	9
Service Test	10
Description of Service-Delivery Systems.....	10
Community Development Services.....	10
Branch Information	10
Year-Over-Year at a Glance.....	13
HMDA And Low-Income Loans.....	13
Small Business Loans.....	13
Loan Information by Census Tract.....	13
Source Documents.....	14
Lending Information - HMDA	15
Low-Income Mortgage Lending Information.....	16
HMDA and Low-Income Compared against the MSA Aggregate Total	17
Employment Information	18
Boston Private Bank.....	1
Boston Private Bank Overview	2
Description	2
Principal Officers.....	2
CFO	2
Chief Compliance Officer	2
Employees	2



Branches	2
CRA Rating	2
Discussion	3
Lending Test.....	3
General Responsiveness to Credit Needs	3
Responsiveness to Low- and Moderate-Income Credit Needs	3
Leadership in Community-Development Loans	3
Innovative & Flexible Lending Practices	4
Investment Test	4
Community Development Investments & Grants.....	4
Service Test	5
Description of Service-Delivery Systems.....	5
Community Development Services.....	5
Branch Information	6
Year-Over-Year at a Glance.....	6
HMDA And Low-Income Loans.....	6
Small Business Loans.....	6
Loan Information by Census Tract.....	7
Source Documents.....	8
Lending Information - HMDA	9
Low-Income Mortgage Lending Information.....	10
HMDA and Low-Income Compared against the MSA Aggregate Total	11
Employment Information	12
Cathay Bank	1
Cathay Bank Overview.....	2
Description	2
Cathay Bank Principal Officers	2
Chairman, President, and CEO.....	2
CFO	2
COO.....	2
Employees	2
Branches.....	2
CRA Rating for Massachusetts.....	2
Discussion	3
Lending Test.....	3
General Responsiveness to Credit Needs	3
Responsiveness to Low- and Moderate-Income Credit Needs	3
Community Development Lending	3
Innovative and/or Flexible Lending Practices	3
Investment Test	3
Service Test	4
Description of Service-Delivery Systems.....	4
Branch Information	4
Community Development Services.....	4
Year-Over-Year at a Glance.....	5
HMDA And Low-Income Loans.....	5
Small Business Loans.....	5
Loan Information by Census Tract.....	5
Source Documents.....	6
Lending Information – HMDA.....	7
Low-Income Mortgage Lending Information.....	8
HMDA and Low-Income Compared against the MSA Aggregate Total	9
No data available Employment Information.....	9
Employment Information	10
Century Bank & Trust.....	1



Century Bank Overview	2
Description	2
Principal Officers.....	2
Co-CEOs and Co-Presidents	2
CFO	2
Compliance Officer	2
Employees	2
Branches	2
CRA Rating	2
Discussion	3
Lending Test.....	3
General Responsiveness to Credit Needs	3
Responsiveness to Low- and Moderate-Income Credit Needs	3
Leadership in Community-Development Loans.....	3
Innovative or Flexible Lending Practices	3
Investment Test	4
Service Test	4
Description of Service-Delivery Systems.....	4
Community Development Services	4
Branch Information	5
Year-Over-Year at a Glance.....	5
HMDA And Low-Income Loans.....	5
Small Business Loans.....	5
Loan Information by Census Tract.....	6
Source Documents.....	7
Lending Information - HMDA	8
Low-Income Mortgage Lending Information.....	9
HMDA and Low-Income Compared against the MSA Aggregate Total	10
Employment Information	11
Citizens Bank	1
Citizens Bank Overview	2
Description	2
Principal Officers.....	2
CEO, Citizens Financial Group	2
President, Citizens Financial Group	2
Employees	2
Branches	2
CRA Rating	2
Discussion	3
Lending Test.....	3
General Responsiveness to Credit Needs	3
Responsiveness to Low- and Moderate-Income Credit Needs	3
Investment Test	3
Service Test	3
Description of Service-Delivery Systems.....	3
Branch Information	4
Special Programs	5
Additional Information	5
Year-Over-Year at a Glance.....	6
HMDA And Low-Income Loans.....	6
Small Business Loans.....	6
Loan Information by Census Tract.....	6
Source Documents.....	7
Lending Information - HMDA	8
Low-Income Mortgage Lending Information.....	9



HMDA and Low-Income Compared against the MSA Aggregate Total	10
Employment Information	11
East Boston Savings Bank.....	1
East Boston Savings Bank Overview	2
Description	2
Principal Officers.....	2
Chairman, CEO, & Acting President.....	2
CFO	2
EVP Compliance Officer	2
Employees	2
Branches	2
CRA Rating	2
Discussion	3
Lending Test.....	3
Responsiveness to Low- and Moderate-Income Credit Needs	3
Leadership in Community-Development Loans	3
Investment Test	3
Service Test	4
Description of Service-Delivery Systems.....	4
Community Development Services	4
Branch Information:	4
Year-Over-Year at a Glance.....	5
HMDA And Low-Income Loans.....	5
Small Business Loans	5
Loan Information by Census Tract.....	5
Source Documents.....	6
Lending Information - HMDA	7
Low-Income Mortgage Lending Information.....	8
HMDA and Low-Income Compared against the MSA Aggregate Total	9
Employment Information	10
Eastern Bank.....	1
Eastern Bank Overview	2
Description	2
Principal Officers.....	2
President	2
CFO	2
Chief Compliance Officer	2
Employees	2
Branches	2
CRA Rating	2
Discussion	3
Lending Test.....	3
General Responsiveness to Credit Needs	3
Responsiveness to Low- and Moderate-Income Credit Needs	3
Leadership in Community-Development Loans.....	3
Innovative & Flexible Lending Practices	4
Investment Test	4
Service Test	4
Description of Service-Delivery Systems.....	4
Community Development Services	5
Branch Information	5
Year-Over-Year at a Glance.....	6
HMDA And Low-Income Loans.....	6
Small Business Loans.....	6
Loan Information by Census Tract.....	6



Source Documents.....	7
Lending Information - HMDA	8
Low-Income Mortgage Lending Information.....	9
HMDA and Low-Income Compared against the MSA Aggregate Total	10
Employment Information	11
Hyde Park Cooperative Bank.....	1
Hyde Park Cooperative Bank Overview.....	2
Description	2
Principal Officers.....	2
CEO & Chairman	2
President	2
CFO	2
Chief Compliance Officer	2
Employees	2
Branches	2
CRA Rating	2
Discussion	3
Lending Test.....	3
General Responsiveness to Credit Needs	3
Responsiveness to Low- and Moderate-Income Credit Needs	3
Investment Test	3
Service Test	3
Branch Information:	3
Additional Information	3
Year-Over-Year at a Glance.....	4
HMDA And Low-Income Loans.....	4
Small Business Loans.....	4
Loan Information By Census Tract	4
Source Documents.....	5
Lending Information - HMDA	6
Low-Income Mortgage Lending Information.....	7
HMDA and Low-Income Compared against the MSA Aggregate Total	8
Employment Information	10
Hyde Park Savings Bank	1
Hyde Park Savings Bank Overview	2
Description	2
Principal Officers.....	2
CEO & President	2
Employees	2
Branches	2
CRA Rating	2
Discussion	3
Lending Test.....	3
General Responsiveness to Credit Needs	3
Responsiveness to Low- and Moderate-Income Credit Needs	3
Leadership in Community-Development Loans.....	3
Investment Test	4
Service Test	4
Description of Service-Delivery Systems.....	4
Community Development Services.....	4
Branch Information	5
Year-Over-Year at a Glance.....	5
HMDA And Low-Income Loans.....	5
Small Business Loans.....	5
Loan Information By Census Tract	5



Source Documents.....	6
Lending Information - HMDA	7
Low-Income Mortgage Lending Information.....	8
HMDA and Low-Income Compared against the MSA Aggregate Total	9
Employment Information	10
JPMorgan Chase Bank	1
JPMorgan Chase Bank Overview	2
Description	2
Principal Officers.....	2
President and CEO, JPMorgan Chase & Co.....	2
CFO	2
Compliance Officer	2
Employees	2
Branches	2
CRA Rating	2
Discussion	3
Lending Test.....	3
General Responsiveness to Credit Needs	3
Responsiveness to Low- and Moderate-Income Credit Needs	3
Leadership in Community-Development Loans	3
Investment Test	3
Service Test	4
Description of Service-Delivery Systems.....	4
Branch Information	4
Community Development Services.....	4
Additional Information	4
Year-Over-Year at a Glance.....	4
HMDA And Low-Income Loans.....	4
Small Business Loans.....	4
Loan Information by Census Tract.....	5
Source Documents.....	6
Lending Information – HMDA.....	7
Low-Income Mortgage Lending Information.....	8
HMDA and Low-Income Compared against the MSA Aggregate Total	9
Employment Information	10
Bank of New York Mellon	1
Bank of New York Mellon Overview	2
Description	2
Principal Officers.....	2
President & CEO	2
CFO	2
Chief Compliance Officer	2
Employees	2
Branches.....	2
CRA Rating	2
Discussion	3
Community Development Lending	3
Level and Nature of Qualified Investments.....	3
Community Development Services.....	3
Branch Information	3
Year-Over-Year at a Glance.....	4
HMDA And Low-Income Loans.....	4
Small Business Loans.....	4
Loan Information By Census Tract	4
Source Documents.....	5



Lending Information - HMDA	6
Low-Income Mortgage Lending Information.....	7
HMDA and Low-Income Compared against the MSA Aggregate Total	8
Employment Information	9
Mount Washington Co-Operative Bank.....	1
Mt. Washington Co-Operative Bank Overview	2
Description	2
Principal Officers.....	2
President & CEO	2
CFO	2
CRA Officer	2
Employees	2
Branches	2
CRA Rating	2
Discussion	2
Lending Test.....	2
General Responsiveness to Credit Needs	2
Responsiveness to Low- and Moderate-Income Credit Needs	2
Community Development Test.....	2
Community Development Loans, Investments, & Grants	3
Community Development Services	3
Branch Information	4
Year-Over-Year at a Glance	4
HMDA And Low-Income Loans	4
Small Business Loans	4
Loan Information By Census Tract	4
Source Documents.....	5
Lending Information - HMDA	6
Low-Income Mortgage Lending Information.....	7
HMDA and Low-Income Compared against the MSA Aggregate Total	8
Employment Information	9
OneUnited Bank	1
OneUnited Overview.....	2
Description	2
Principal Officers.....	2
CEO	2
President	2
CFO	2
Chief Compliance Officer	2
Employees	2
Branches	2
CRA Rating for Massachusetts	2
Discussion	3
Lending Test.....	3
General Responsiveness to Credit Needs	3
Responsiveness to Low- and Moderate-Income Credit Needs	3
Community Development Test.....	3
Lending.....	3
Investments.....	3
Service.....	4
Branch Information	4
Year-Over-Year at a Glance	4
HMDA And Low-Income Loans	4
Small Business Loans	4
Loan Information by Census Tract	4



Source Documents.....	5
Lending Information - HMDA	6
Low-Income Mortgage Lending Information.....	7
HMDA and Low-Income Compared against the MSA Aggregate Total	8
Employment Information	9
Sovereign Bank.....	1
Sovereign Bank Overview.....	2
Description	2
Principal Officers.....	2
President & CEO, Sovereign Bancorp.....	2
CFO	2
Chief Compliance Officer	2
Employees	2
Branches	2
CRA Rating	2
Discussion	3
Lending Test.....	3
General Responsiveness to Credit Needs	3
Responsiveness to Low- and Moderate-Income Credit Needs	3
Leadership in Community-Development Loans	3
Investment Test	3
Service Test	4
Retail Services.....	4
Community-Development Services.....	4
Branch Information	5
Year-Over-Year at a Glance.....	7
HMDA And Low-Income Loans.....	7
Small Business Loans.....	7
Loan Information by Census Tract.....	7
Source Documents.....	8
Lending Information - HMDA	9
Low-Income Mortgage Lending Information.....	10
HMDA and Low-Income Compared against the MSA Aggregate Total	11
Employment Information	12
Wainwright Bank & Trust	1
Wainwright Bank Overview.....	2
Description	2
Principal Officers:	2
CEO and President	2
CFO	2
Chief Compliance Officer	2
Employees	2
Branches	2
CRA Rating	2
Discussion	3
Lending Test.....	3
General Responsiveness to Credit Needs	3
Responsiveness to Low- and Moderate-Income Credit Needs	3
Community Development Test.....	4
General Responsiveness to Community Needs	4
Community Development Lending	4
Qualified Investments & Donations	4
Community Development Services.....	5
Branch Information	5
Additional Information	5



Year-Over-Year at a Glance.....	6
HMDA And Low-Income Loans.....	6
Small Business Loans.....	6
Loan Information By Census Tract.....	6
Source Documents.....	7
Lending Information - HMDA.....	8
Low-Income Mortgage Lending Information.....	9
HMDA and Low-Income Compared against the MSA Aggregate Total.....	10
Employment Information.....	11
Appendix A.....	1
Appendix A.....	2
List of Source Documents.....	2
Bank of America.....	2
Boston Private Bank.....	2
Cathay Bank.....	2
Century Bank & Trust.....	2
Citizens Bank of Massachusetts:.....	3
East Boston Savings Bank.....	3
Eastern Bank:.....	3
Hyde Park Cooperative Bank.....	3
Hyde Park Savings Bank.....	4
JPMorgan Chase Bank.....	4
Bank of New York Mellon.....	4
Mt. Washington Bank.....	4
OneUnited Bank.....	5
Sovereign Bank.....	5
Wainwright Bank.....	5
Appendix B.....	1
Appendix B.....	2
Community Reinvestment Act.....	2
Overview.....	2
Appendix C.....	1
Appendix C.....	2
Rating Definitions.....	2
Lending Performance.....	2
Outstanding.....	2
High Satisfactory.....	2
Low Satisfactory.....	2
Needs to Improve.....	2
Substantial Noncompliance.....	2
Investment Performance.....	3
Outstanding.....	3
High Satisfactory.....	3
Low Satisfactory.....	3
Needs to improve.....	3
Substantial noncompliance.....	3
Service Performance.....	3
Outstanding.....	3
High Satisfactory.....	3
Low satisfactory.....	3
Needs to improve.....	3
Substantial noncompliance.....	4
Appendix D.....	1
Appendix D.....	2
Definitions.....	2



Income Levels	2
Low Income.....	2
Moderate Income.....	2
Middle Income.....	2
Upper Income	2
Regulations and Regulatory Agencies.....	2
FDIC.....	2
FFIEC	2
HMDA.....	2
OCC.....	3
OTS	3
NobleAssociates	1
NobleAssociates	2





The State of Banking in the City of Boston



A Year of Crisis and Action

The housing crisis that began in 2006 expanded and deepened nationwide in 2007, and Massachusetts was no exception. There were over 30,000 foreclosures in Massachusetts in 2007, roughly 70% higher than the already record-setting 2006 levels. Foreclosure levels in 2006 were themselves already 70% higher than in 2005 — a two-year spike in foreclosures that hit poor and minority neighborhoods the hardest.¹

This tidal wave of foreclosures is the result of the confluence of high housing prices, low but rising interest rates, a sluggish job market, and the rise of out-of-state mortgage companies.² Mortgage companies and other non-CRA regulated lenders have “ushered in an array of exotic and often risky mortgage loans” specifically targeted at low-income and minority borrowers.³ These products (which include interest-only mortgages, adjustable-rate loans, and high-fee sub-prime loans) allow low-income borrowers to stretch their income while assuming much greater risk, and are heavily promoted by mortgage companies among minority and low-income populations. Many begin at a low introductory rate, then reset to higher monthly payments after a certain period.

This flood of subprime lending hit borrowers especially hard when interest rates began to rise in 2006 and into 2007. Because roughly 80% of all subprime loans “carry interest rates that adjust every 12 months after the loan has been held for two years, many people who got these loans in 2005 are now seeing their monthly payments jump 30 to 50 percent.”⁴ In 2007, a record \$375

billion of subprime loans reset to higher interest rates nation-wide.⁵

Low-income buyers “struggling to finance a home took on mortgages with low adjustable rates that nevertheless swallowed half their monthly take-home pay, leaving little financial cushion” when interest rates increased.⁶

This crisis was exacerbated by falling house prices. 2006 was the worst year in a decade for the Massachusetts housing market⁷ and prices continued to fall in 2007, along with a steep decline in sales.⁸ This drop in value and in sales conspired to remove the last few options left to homeowners unable to pay their mortgages on time. Homeowners “found it more difficult to make their payments on variable-rate mortgages as interest rates rose, but they were less able to refinance their loans at more attractive rates—or sell and pay off their debts—because the value of their homes fell or remained flat.”⁹

2007 was a year of nationwide housing crisis, but it also saw the first concerted efforts to curtail the housing disaster and fix the structures that contributed to it. Federal, state, and local governments spurred to action by the wave of foreclosures worked to address the systemic problems around subprime and predatory lending, while private actors sought new remedies and solutions.

Massachusetts, which in 2006 was among the states hardest hit by the housing crisis, emerged in 2007 as a national leader in the regulation of the mortgage industry. Using the success of the CRA as a model, the state implemented what has come to be known as the “Second Wave” of Home Mortgage Regulation. 2007 was a year of great change in the lending environment in

The State of Banking in the City of Boston

¹ FILINGS TO FORECLOSE SET RECORD, Boston Globe, Feb 7, 2007; Department of Neighborhood Development press release, Menino Announces New Foreclosure Prevention Measures, October 18, 2006

² FORECLOSURE FILINGS JUMP IN MASS. AS HOME VALUES SOAR, Boston Globe, June 18, 2005

³ MOST MASS. HOME BUYERS USING OUT-OF-STATE LENDERS, Boston Globe, January 10, 2006

⁴ Ibid.

⁵ **FORECLOSURES IN US CLIMB 75% AS HOME PRICES FALL**, Boston Globe, January 30, 2008

⁶ ADJUSTABLE-RATE LOANS COME HOME TO ROOST, Boston Globe, January 11, 2006

⁷ Boston Globe, January 26, 2007

⁸ **MASS. HOME SALES AND PRICES FALL**, Boston Globe, January 29, 2008

⁹ HOUSING SLOWDOWN SQUEEZES BORROWERS, Boston Globe, January 30, 2006



Massachusetts, but the impact of these changes is far from certain.

Increased Effectiveness of the CRA

2007 saw a dramatic expansion in the effectiveness of the CRA in Massachusetts. Changing lending patterns in the state led to a sharp rise in the share of loans covered by the CRA. In 2006, lenders governed by the CRA accounted for only 22% of home mortgage loans in Boston and 26% in the state; but in 2007, these numbers leaped to 37% and 38%, respectively. This is the largest increase in years of the market share of lending governed by the CRA.

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

The 2007 upsurge in the market share of CRA-governed lending is an extremely positive development for the state of home lending in Massachusetts because among the institutions it governs, the effectiveness of the CRA is clear and encouraging. According to the Massachusetts Community & Banking Council's Changing Patterns XV, institutions governed by the CRA in 2007 "directed a substantially greater share of their total loans as prime loans—and a substantially smaller share of their total loans as [subprime loans]—to every one of the categories of traditionally underserved borrowers and neighborhoods than did lenders not covered by the CRA."¹⁰

The differences in lending patterns between CRA and non-CRA governed lenders is striking.

Subprime loans made up 17% of all loans by out-of-state banks and mortgage companies; but among CRA-governed institutions, subprime loans constituted only 1.9% (in Boston) to 2.8%

(statewide) of total loans.

Non-CRA lenders directed a much higher percentage of subprime loans to minority applicants. In Boston, subprime loan shares were 22% for blacks and 20% for Latinos, but only 5% for whites. In Boston, subprime loans to blacks "made up just 0.3% of all loans by CRA-covered lenders, while making up 5.3% of the loans by licensed mortgage lenders and 4.3% of loans by other lenders. The same pattern holds true for Latino borrowers."¹¹ Among the top five lenders (most of which are not covered by the CRA), black and Latino borrowers were three to four times more likely to get a subprime loan than white borrowers — and this disparity actually *increases* when adjusted for income.

Non-CRA lenders were also much more likely to originate subprime loans in low- and moderate-income areas. Over 20% of all non-CRA loans in these less affluent census tracts were subprime loans, while among CRA lenders the subprime proportion in the same areas was less than 2%.¹²

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. Because the CRA applies to a minority of loans originated in Massachusetts, its ability to protect the low-income market from targeting and exploitation is severely limited. The results: the disproportionate concentration of sub-prime loans among low-income and minority borrowers; disproportionate denial rates for minority borrowers; dearth of lending in low- and moderate-income families and census tracts; and the proliferation of the high-risk loan products that led to the foreclosure crisis.

The Second Wave

The success of the CRA provided a model and inspiration for revolutionary measures aimed at curbing subprime and predatory lending. One national report cited by the MCBC found that "banks originating loans in their Community Reinvestment Act [CRA] assessment areas...were substantially less likely than other

¹⁰ Jim Campen, Changing Patterns XV

¹¹ Ibid.

¹² Ibid.



lenders to make the kinds of risky home purchase loans that helped fuel the foreclosure crisis.”¹³ New state legislation in 2007 looked to expand on the effectiveness of the CRA by imposing CRA-type regulations and oversight on mortgage companies.

The “Act Protecting and Preserving Homeownership,” championed by Mayor Menino of Boston and passed in November 2007, imposes “the nation’s strictest set of mortgage laws and regulations.”¹⁴

Section 13 of the Act provides for CRA-inspired oversight of mortgage lending companies that made 50 or more loans in Massachusetts in the previous year. The companies will “will be evaluated by the Division of Banks for their performance in helping low- and moderate-income residents acquire and remain in affordable housing with loans on reasonable rates and terms, avoiding patterns of lending that result in the loss of affordable housing, and working with delinquent borrowers.”¹⁵ The results of the evaluation and rating will be made public, and unsatisfactory ratings may result in the loss of the lender’s license.

The evaluations under this new law have yet to begin: the regulations governing the evaluations were issued by the Massachusetts Division of Banks in September 2008, and the first examinations are slated to begin in 2009.

The bill also mandates credit counseling, stiffened penalties for predatory lending, and a 90-day right to cure a default for homeowners.

This is a tremendously innovative, sweeping, and revolutionary piece of legislation. According to Tom Callahan of the Massachusetts Affordable Housing Alliance, “This puts Massachusetts in the lead in the country in responding to subprime lending, and it’s not even close. We’ll have the toughest set of monitoring and oversight of the mortgage industry of any state in the country.”¹⁶ This act places Massachusetts in a national leadership position at the forefront of what has

been called the “Second Wave” of mortgage lending reform. The act became even more important after two similarly sweeping national mortgage reform bills introduced by Rep. Barney Frank (D-Newton) passed in the House by wide margins, but never came to a Senate vote.

The Act Protecting and Preserving Homeownership was accompanied by a number of other new and innovative programs. In 2006, Mayor Menino announced a dramatic expansion of the City’s foreclosure prevention services, launched a refinancing consortium (the City of Boston First Choice Lenders), and established the Boston Homeownership Preservation Fund to support foreclosure prevention counseling and outreach. In addition, the City expanded foreclosure counseling services offered through the city’s Boston Home Center nine-fold.¹⁷

At the state level, 2007 saw a major expansion of the Soft Second Loan Program, which is designed to reduce the substantial down payments and large monthly mortgage bills that often present insurmountable obstacles to lower-income homebuyers. The program’s income requirements were adjusted and its maximum amount was raised, allowing more borrowers to qualify. The Soft Second program has benefited nearly 10,000 home buyers in Massachusetts and has consistently defied the impression that loans to low-income communities are high-risk.¹⁸ Governor Deval Patrick instituted the Massachusetts Home Saver program, a \$250 million state effort to refinance subprime borrowers into loans with fixed interest rates. Unveiled in July 2007, the program is a major piece of the Governor’s plan to stem foreclosures in the state. The program met with difficulty attracting eligible borrowers, and did not make its first loan until December of 2007, after it had relaxed its eligibility requirements.

These legislative changes were accompanied by private action. In December 2007, a group of major mortgage companies agreed to freeze payments on approximately 250,000 loans.

¹³ Quoted in *Changing Patterns XV*

¹⁴ FIXES MADE IN 2007 NOT ENOUGH TO HALT FORECLOSURES, *The Boston Globe*, January 2, 2008

¹⁵ *Changing Patterns XV*

¹⁶ Quoted in STATE TOUGHENS RULES ON MORTGAGES, *the Boston Globe*, October 18, 2007

¹⁷ Department of Neighborhood Development press release, [Menino Announces New Foreclosure Prevention Measures](#), October 18, 2006

¹⁸ Massachusetts Housing Partnership press release, [Romney announces changes to SoftSecond Loan Program, increasing opportunities for first-time homebuyers](#), 22 May 2003



Countrywide Financial, the nation's largest mortgage lender and one of the largest subprime lenders, reworked loans for approximately 90,000 borrowers in 2007.¹⁹ The company also allowed the Boston-based Neighborhood Assistance Corporation of America, a longtime industry critic, to reengineer its least affordable loans: "Neighborhood Assistance Corp. of America will calculate how much overwhelmed borrowers can afford to pay each month, and Countrywide will alter loan terms accordingly."²⁰

Massachusetts took a leadership position in combating the subprime crisis in 2007, far ahead of other state and federal institutions. The sum total of the actions taken on a state level in 2007 is an aggressive and sweeping new response to the foreclosure crisis and approach to mortgage regulation — a true Second Wave.

Continuing Challenges

The impact of these changes has yet to be seen, and it is certain that deep systemic challenges will continue to face the City of Boston as it seeks to meet the housing needs of its residents. The relative success of the CRA in increasing opportunities for underserved borrowers has historically been undermined by the dominance of non-CRA lending in Massachusetts, and it remains to be seen whether the changes of 2007 will have a lasting impact on the lending patterns of non-bank lenders. Revolutionary state legislation completely changed the lending environment in Boston, with a series of major lending reforms that will continue into 2008, and whose impact will be seen in the years to come.

Notes on the Boston MSA

In January 2003, new MSA boundaries defined by the Office of Management and Budget based on 2000 census data went into effect. The new definitions resulted in changes to the boundaries of many existing MSAs and the creation of new statistical areas —Metropolitan Divisions (MDs). The old Boston PSMA has been replaced by the Boston-Quincy MD as the basic

unit of CRA and HMDA evaluation. This report makes year-over-year comparisons with 2005 and 2006 data, but cannot make meaningful statistical comparisons with lending data before 2004.

2006 Boston MSA Comparative Charts

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

In the first two charts, lending totals of all lenders (the lenders listed in this report 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.

¹⁹ FIXES MADE IN 2007 NOT ENOUGH TO HALT FORECLOSURES, The Boston Globe, January 2, 2008

²⁰ HUB GROUP, COUNTRYWIDE IN DEAL, The Boston Globe, October 24, 2007

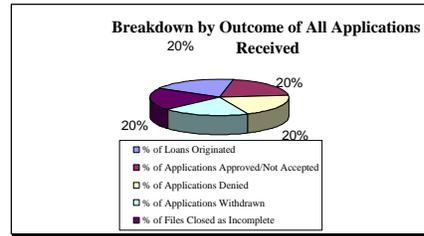
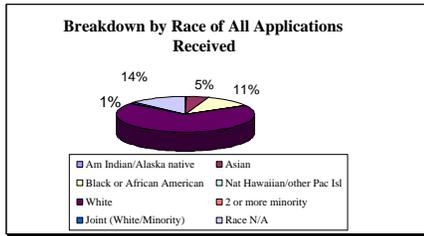
Aggregate Lending Information - HMDA

MSA: 14484 - Boston/Quincy, MA

2007

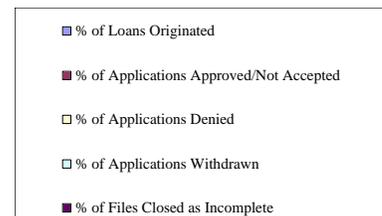
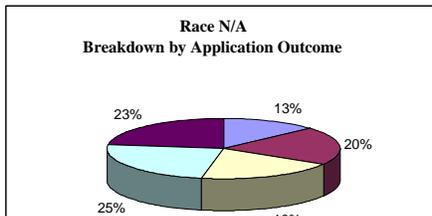
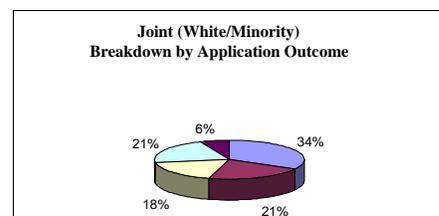
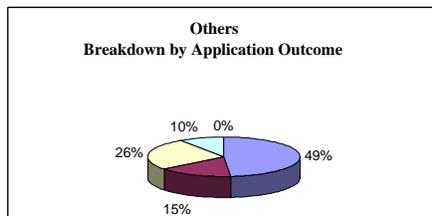
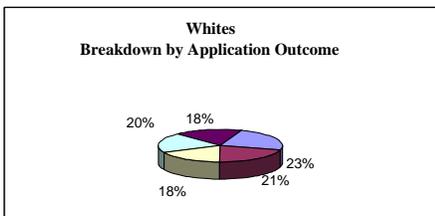
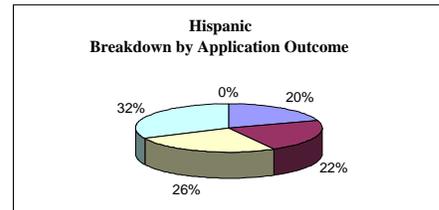
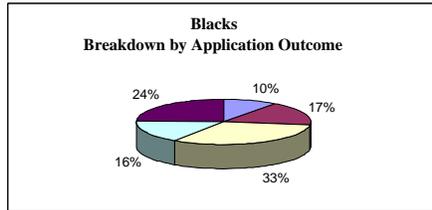
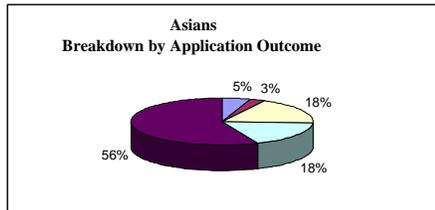
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	105	0%	39	0%	3	0%	34	1%	15	1%	14	2%
Asian	1904	5%	1341	6%	178	5%	201	3%	140	5%	44	6%
Black or African American	4077	11%	1797	7%	418	13%	1405	24%	317	12%	140	18%
Nat Hawaiian/other Pac Isl	120	0%	73	0%	11	0%	23	0%	13	0%	0	0%
White	25103	68%	17791	74%	2094	63%	3191	54%	1604	61%	423	55%
2 or more minority	55	0%	46	0%	2	0%	6	0%	1	0%	0	0%
Joint (White/Minority)	424	1%	327	1%	29	1%	43	1%	23	1%	2	0%
Race N/A	4926	13%	2723	11%	563	17%	959	16%	530	20%	151	20%
Total	36714	100%	24137	100%	3298	100%	5862	100%	2643	100%	774	100%

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



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

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

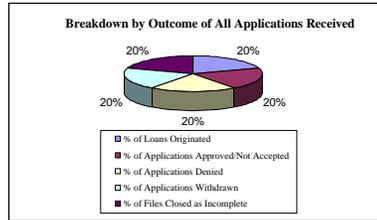
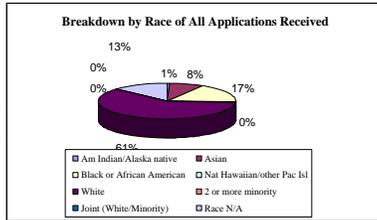


Aggregate Low-Income Mortgage Lending MSA: 14484 - Boston/ Quincy, MA

2007

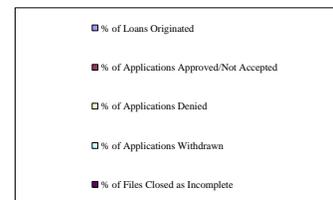
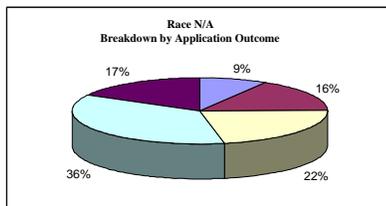
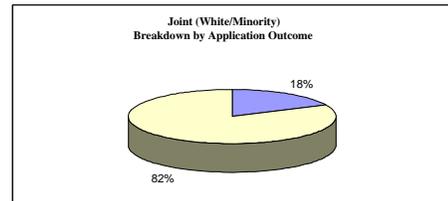
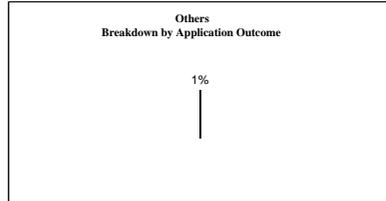
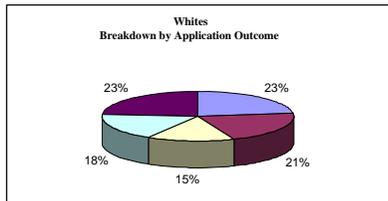
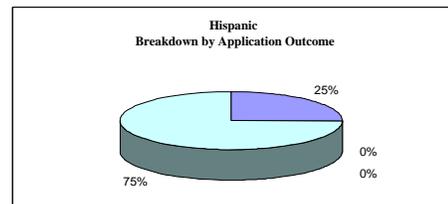
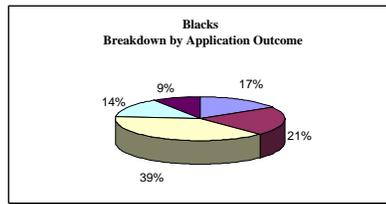
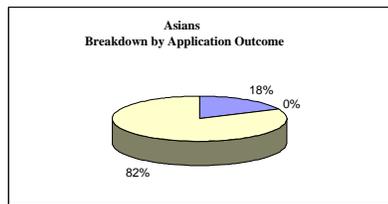
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	6	1%	2	0%	0	0%	4	1%	0	0%	0	0%
Asian	92	8%	65	10%	5	7%	15	5%	5	5%	2	7%
Black or African American	192	17%	82	13%	11	16%	85	30%	12	11%	2	7%
Nat Hawaiian/other Pac Isl	3	0%	2	0%	0	0%	0	0%	1	1%	0	0%
White	680	61%	439	69%	42	63%	122	43%	57	53%	20	71%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	3	0%	1	0%	0	0%	2	1%	0	0%	0	0%
Race N/A	146	13%	47	7%	9	13%	53	19%	33	31%	4	14%
Total	1122	100%	638	100%	67	100%	281	100%	108	100%	28	100%

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.



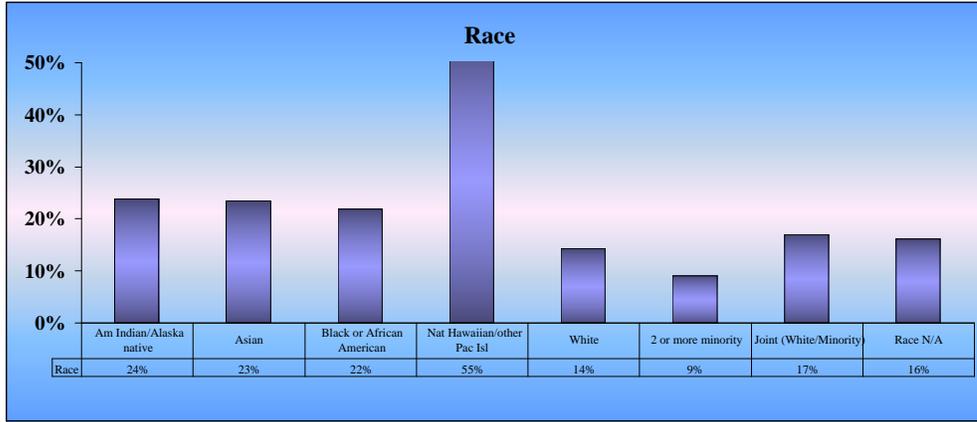
Link Deposit Report Banks Compared Against the MSA Aggregate Total

2007

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	25	24%	15	38%	1	33%	9	26%	0	0%	0	0%
Asian	447	23%	314	23%	58	33%	53	26%	19	14%	3	7%
Black or African American	891	22%	546	30%	93	22%	211	15%	38	12%	3	2%
Nat Hawaiian/other Pac Isl	66	55%	46	63%	8	73%	11	48%	1	8%	0	0%
White	3592	14%	2733	15%	406	19%	320	10%	100	6%	33	8%
2 or more minority	5	9%	4	9%	0	0%	1	17%	0	0%	0	0%
Joint (White/Minority)	72	17%	53	16%	12	41%	4	9%	3	13%	0	0%
Race N/A	797	16%	546	20%	126	22%	105	11%	14	3%	6	4%
Total	5895	16%	4257	18%	704	21%	714	12%	175	7%	45	6%

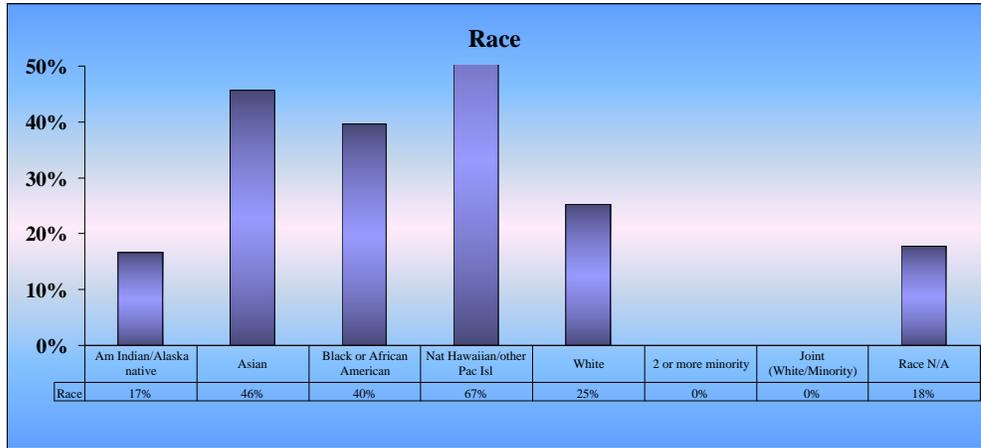
The chart below is the breakdown by race of the applications received collectively at the banks covered in this report (excluding Mellon) compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications processed collectively at the banks covered 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	1	17%	0	0%	0	0%	1	25%	0	0%	0	0%
Asian	42	46%	30	46%	2	40%	8	53%	2	40%	0	0%
Black or African American	76	40%	35	43%	5	45%	32	38%	4	33%	0	0%
Nat Hawaiian/other Pac Isl	2	67%	2	100%	0	0%	0	0%	0	0%	0	0%
White	172	25%	137	31%	6	14%	24	20%	0	0%	5	25%
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	26	18%	11	23%	1	11%	14	26%	0	0%	0	0%
Total	319	28%	215	34%	14	21%	79	28%	6	6%	5	18%

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





Ratings Summary



Summary

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

FDIC Review Schedule

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

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

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

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

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

OCC and OTS Review Schedule

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

Overall Rating

The following overall Community Reinvestment Act (CRA) ratings²¹ are for the year 2007.

Bank	Rating
Bank of America	OUTSTANDING
Boston Private Bank	OUTSTANDING
Cathay Bank	SATISFACTORY
Century Bank and Trust (Century Bank)	SATISFACTORY
Citizens Bank of Massachusetts	OUTSTANDING
East Boston Savings Bank (EBSB)	OUTSTANDING
Eastern Bank	OUTSTANDING
Hyde Park Cooperative Bank	SATISFACTORY
Hyde Park Savings Bank (HPSB)	SATISFACTORY
JPMorgan Chase Bank	OUTSTANDING
Bank of New York Mellon	OUTSTANDING
Mt. Washington Bank	SATISFACTORY
OneUnited Bank	SATISFACTORY
Sovereign Bank	OUTSTANDING
Wainwright Bank and Trust (Wainwright Bank)	OUTSTANDING

²¹ 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 America²²

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

Boston Private Bank & Trust Company²³

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

Cathay Bank²⁴

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

Century Bank & Trust²⁵

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

Citizen's Bank of Massachusetts²⁶

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

East Boston Savings Bank²⁷

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

Eastern Bank²⁸

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

²² Based on most recent CRA Performance Evaluation by OCC published 2006.

²³ Based on most recent CRA Performance Evaluation by FDIC published 2008.

²⁴ Based on most recent CRA Performance Evaluation by FDIC published 2007.

²⁵Based on most recent CRA Performance Evaluation by FDIC published 2007.

²⁶ Based on most recent CRA Performance Evaluation by FDIC published 2007.

²⁷ Based on most recent CRA Performance Evaluation by FDIC published 2005.

²⁸ Based on most recent CRA Performance Evaluation by FDIC published 2007.



Hyde Park Cooperative Bank²⁹

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

Mt. Washington Bank³³

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

Hyde Park Savings Bank³⁰

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

OneUnited Bank³⁴

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

JPMorgan Chase Bank³¹

Regulatory Body:	Federal Reserve Bank of New York
Area Tested	Rating
Overall:	OUTSTANDING
Lending:	OUTSTANDING
Investment:	OUTSTANDING
Service:	OUTSTANDING

Sovereign Bank (Massachusetts)³⁵

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

Bank of New York Mellon³²

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

Wainwright Bank and Trust³⁶

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

²⁹ 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 2004.

³⁰ Based on most recent CRA Performance Evaluation by FDIC published 2006.

³¹ Based on most recent CRA Performance Evaluation published by Federal Reserve Bank of New York published 2003.

³² Based on most recent CRA Performance Evaluation published by Federal Reserve Bank of New York published 2007.

³³ Based on most recent CRA Performance Evaluation by FDIC published 2007.

³⁴ Ibid.

³⁵ Based on most recent CRA Performance Evaluation by OTS published 2005.

³⁶ Based on most recent CRA Performance Evaluation by FDIC published 2008.





Bank of America



Bank of America Overview

Bank of America, N.A.
101 South Tryon Street
Charlotte, NC 28255

Description

Bank of America, N.A. is a full-service interstate bank that operates in 32 states, the District of Columbia, and over 30 foreign countries, with assets of \$1.31 trillion. The bank, headquartered in Charlotte, North Carolina, is a subsidiary of Bank of America Corporation.

The bank has established 6149 retail banking offices and 18,753 ATMs. It boasts a user base of over 21 million. The bank offers a varied and wide range of products and services directly or indirectly through affiliates. A major focus of Bank of America, N.A. is on community development initiatives, particularly in its role as a developer through its community development corporations.

Bank of America entered the Massachusetts market in 2003, when it merged with Boston-based FleetBoston Financial. The merger was finalized in 2005. Bank of America, N.A. is currently the largest banking financial institution in Massachusetts. As of June 30, 2006, the bank holds 20% of the market share, representing \$32.9 billion in deposits.

In January 2008, the bank agreed to acquire Countrywide Financial Corporation.

Principal Officers

Chairman, CEO, & President

Kenneth D. Lewis
101 South Tryon Street
Charlotte, NC 28255
704-386-5681

CFO

Joe L. Price
101 South Tryon Street
Charlotte, NC 28255
704-386-5681

Global Compliance Officer

Regina Sullivan
101 South Tryon Street
Charlotte, NC 28255
704-386-5681

Employees

Number of Employees	156,794 ³⁷
Number of Employees in Massachusetts	NA
Percentage of Women Employees	66.0%
Percentage of Minority Employees	27.0%

Branches

Number of Branches - Total	6149
Branches Within Boston PSMA	45
Number of ATMs	18,753
Number of Free-Standing ATMs	72 in MSA

CRA Rating

Rating Agency	Office of the Comptroller of the Currency
Most Recent Rating	2006
Overall Rating for Massachusetts	OUTSTANDING ³⁸
Lending Test Rating for Massachusetts	OUTSTANDING
Investment Test Rating for Massachusetts	OUTSTANDING
Service Test Rating for Massachusetts	OUTSTANDING

³⁷ FDIC Institution Directory

³⁸ Based on most recent CRA Performance Evaluation by OCC published 2006.



Discussion

Overall rating for Massachusetts: OUTSTANDING³⁹

Bank of America, N.A. received both an overall CRA rating for its nationwide banking activity and specific ratings for each state in which it operates. The bank received overall ratings and Massachusetts state ratings of Outstanding in every category. The discussion below focuses on the Massachusetts evaluation, especially on the Boston-Quincy Metropolitan Division (MD).

Lending Test

Lending Test Rating for Massachusetts: OUTSTANDING⁴⁰

General Responsiveness to Credit Needs

Bank of America's lending levels reflect good responsiveness by the bank to the credit needs of its Massachusetts assessment areas.

Based on a full-scope review, lending performance in the Boston-Quincy MD is excellent. With the leading deposit market share, the bank ranks fifth, third, and fourth in market share for home purchase, home improvement, and home refinance loans, respectively, among deposit-taking institutions in Boston-Quincy. The bank ranks fourth among deposit-taking institutions for small-business lending.⁴¹

Responsiveness to Low- and Moderate-Income Credit Needs

Bank of America's loans displayed excellent distribution of among geographies and good distribution among borrowers of different income levels. In the Boston-Quincy MD, the borrower distribution for home improvement loans is excellent, and for home purchase and home refinance loans is good after consideration of the high-cost housing market.⁴²

The bank's borrower distribution for home purchase loans is excellent. The portion of home purchase loans originated to low-income borrowers is near to the percent of low-income families within the MD. In addition, the portion of loans originated to moderate-income borrowers exceeds the percent of moderate-income families within the MD. The market share of home purchase loans to low- and moderate-income borrowers exceeds the bank's overall market share for this type of loan within the MD. For both home improvement and home refinance loans, the bank's market share among low- and moderate-income borrowers exceeds the bank's overall market share in Boston.

Home purchase loan geographic distribution within the Boston-Quincy MD is excellent. The portion of loans made in LMI geographies exceeds the percent of owner occupied units in like geographies. In addition, the market share of home purchase loans in low-income geographies exceeds and in moderate-income geographies substantially meets the bank's overall market share within the MD.

Home improvement and refinance loan geographic distribution within the Boston-Quincy MD is excellent. In addition, the market share of these loans in low- and moderate-income geographies exceeds the bank's overall market share within the MD.

Innovative or Flexible Lending Practices

Bank of America offers a range of innovative and flexible lending programs, which positively impacted its Lending Test performance.

Bank of America established its *Neighborhood Advantage* program to address affordable housing needs in its assessment areas. The *Neighborhood Advantage Zero Down* product targets LMI applicants with good credit histories who are unable to provide a sufficient down payment required under traditional mortgage products. In addition, the *Neighborhood Advantage Credit Flex* program accommodates low- and moderate-income families who pay their bills on time but have yet to establish credit histories. Although this product requires a 3% down payment, the borrower need only

³⁹ Based on most recent CRA Performance Evaluation by OCC published 2006.

⁴⁰ Ibid.

⁴¹ Ibid.

⁴² Ibid.



contribute one-third of this amount; the remainder comes from gifts or other sources.⁴³

Bank of America also partners with the Association of Community Organizations for Reform Now (ACORN) to provide mortgage loans for low- to moderate-income applicants. This product requires no down payment, has no minimum credit score requirement, and includes home buyer education.⁴⁴

In April 2007, Bank of America initiated its No Fee Mortgage PLUS program, which offered customers a mortgage loan product with no application fee, no closing fee, and no private mortgage insurance. The No Fee Mortgage PLUS program generated more than \$13 billion in funded loans in 2007.⁴⁵

Leadership in Community Development

Loans

The bank has maintained community development lending levels that had a significantly positive impact on performance within the state.⁴⁶

Community development lending had a significantly positive impact on lending performance in Boston. During the evaluation period, the bank originated 58 community development loans totaling \$235.2 million. A majority of these loans were for affordable housing and created more than 1,700 LMI housing units within the Boston-Quincy MD.⁴⁷

In 2004, the bank set an ambitious goal of \$750 billion in community development loans over ten years, one of the largest community development goals ever established by an American financial institution. In 2007, Bank of America lent and invested \$100.1 billion in four key areas. It provided more than \$54.4 billion for affordable housing; \$25.6 billion in loans and investments for small business growth and development; \$15.6 billion in consumer loans to low- and moderate-income borrowers for their home, education and personal needs; and \$4.5 billion in loans, investments and grants for economic

development efforts in support of community revitalization, access to capital and job creation. In the third year of the 10-year, \$750 billion goal, the bank has achieved \$273.9 billion to date in loans and investments.⁴⁸

Investment Test

**Investment Test Rating for
Massachusetts: OUTSTANDING⁴⁹**

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

Investment Test performance in the Boston-Quincy MD is excellent. The bank made 355 investments in Boston-Quincy during the assessment period, totaling \$224.5 million. As of year-end 2006, prior period investments totaled \$78.2 million.

The largest investments in the Boston-Quincy MD totaled \$115.5 million and consisted of investments in LIHTC projects and funds. Those projects provided more than 1,500 housing units to low- and moderate-income households.

Bank of America also made investments totaling \$1.5 million in six CDFIs and \$85 million in bonds and projects that revitalized or stabilized low- and 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.

Bank of America's New England giving increased 18 percent from 2003 to 2005, allaying fears that the bank's merger with FleetBoston would result in a decrease in grants to local nonprofits and charitable organizations.⁵⁰

⁴³ Ibid.

⁴⁴ Ibid.

⁴⁵ Bank of America Annual Report 2007

⁴⁶ Based on most recent CRA Performance Evaluation by OCC published 2006.

⁴⁷ Ibid.

⁴⁸ Bank of America website; Bank of America Annual Report, 2006 and 2007.

⁴⁹ Ibid.

⁵⁰ BANK OF AMERICA CORP. INCREASES N.E. DONATIONS, The Boston Globe, July 2, 2006



Service Test

Service Test Rating for Massachusetts:
OUTSTANDING⁵¹

Service Test performance in Massachusetts is rated Outstanding. The bank’s provision of combined retail banking and community development services shows excellent responsiveness to banking and community needs.

Description of Service-Delivery Systems

Service delivery systems in the Boston-Quincy MD 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 these areas. The percentage of the bank’s branches in moderate-income geographies is near to the percentage of the population residing in these areas.

Eight branches located in close proximity to LMI geographies, as well as the bank’s telephone and electronic banking delivery systems, improve access by low- and moderate-income individuals to retail banking services. Compared to 31% of the population that resides in low- and moderate-income geographies, 30% of customers that use alternative delivery systems reside in such geographies.

Branch openings and closings have improved the accessibility of the bank’s delivery systems, particularly in low- and moderate-income geographies. Since the last CRA evaluation, the bank opened one branch in a moderate-income geography. Hours and services do not vary in a way that inconveniences the people living in Boston. The bank offers Saturday hours in a portion of its branches located in low- and moderate-income geographies.

Community Development Services

Bank of America is a leader in providing community development services to the Boston-Quincy MD. The bank served 26 organizations pursuing a variety of initiatives targeted at low- and moderate-income areas and individuals. These services consistently addressed

community development needs such as technical assistance for organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize low- and moderate-income geographies. The bank also provided home buyer education to low- and moderate-income individuals through partnership with 25 non-profit organizations.

The Bank of America Charitable Foundation has set a 10-year, \$1.5 billion goal for charitable giving focused on local priorities, funding flexibility, and leadership development. The Foundation in 2007 donated more than \$200 million overall. The foundation’s Neighborhood Excellence Initiative (NEI) has provided nearly \$90 million to support local communities. The program also nurtures leadership through paid internships and innovative development forums.⁵²

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
100 Federal Street Boston, MA 02110	✓	✓
100 River Street Boston, MA 02126	✓	✓
104 Canal Street Boston, MA 02114	✓	✓
1104 Massachusetts Ave. Dorchester, MA 02125	✓	✓
114 Dudley St. Roxbury, MA 02119	✓	✓
1219 River Street Boston, MA 02136	✓	✓
125 High Street Boston, MA 02110	✓	✓
133 Massachusetts Ave. Boston, MA 02115	✓	✓
1440 Dorchester Ave. Dorchester, MA 02122	✓	✓
157 Stuart Street Boston, MA 02116	✓	✓
161 Cambridge Street Boston, MA 02134	✓	✓
1614 Tremont Street Boston, MA 02120	✓	✓
175 Federal Street Boston, MA 02110	✓	✓
1857 Centre Street	✓	✓

⁵¹ Based on most recent CRA Performance Evaluation by OCC published 2006.

⁵² Bank of America Annual Report 2007



West Roxbury, MA 02132			Boston, MA 02215		
210 Berkeley Street	✓	✓	79 Summer St.	✓	✓
Boston, MA 02116			Boston, MA 02110		
260 Hanover Street	✓	✓	855 Boylston Street	✓	✓
Boston, MA 02113			Boston, MA 02116		
285 Huntington Avenue	✓	✓	Terminal D	✓	✓
Boston, MA 02115			Logan International Airport		
29 Corinth Street	✓	✓	East Boston, MA 02128		
Boston, MA 02131			Volpe Terminal (E)	✓	✓
3 Center Plaza	✓	✓	Logan International Airport		
Boston, MA 02108			East Boston, MA 02128		
315 Centre Street	✓	✓	1 Post Office Square	✓	
Jamaica Plain, MA 02130			Boston, MA 02109		
315 Washington Street	✓	✓	1 Summer St.	✓	
Boston, MA 02108			Dorchester, MA 02124		
333 Longwood Avenue	✓	✓	100 Morrissey Blvd	✓	
Boston, MA 02115			Dorchester, MA 02125		
410 Brookline Ave.	✓	✓	100 Terminal A	✓	
Boston, MA 02215			Logan International Airport		
460 West Broadway	✓	✓	East Boston, MA 02128		
Boston, MA 02127			101 Huntington Ave.	✓	
470 Blue Hill Ave.	✓	✓	Boston, MA 02199		
Dorchester, MA 02121			11 Winter St.	✓	
5 Chestnut Hill Avenue	✓	✓	Boston, MA 02110		
Boston, MA 02135			110 Huntington Ave.	✓	
50 Milk Street	✓	✓	Boston, MA 02116		
Boston, MA 02109			1146 Blue Hill Ave.	✓	
540 Commonwealth Ave.	✓	✓	Dorchester, MA 02124		
Boston, MA 02215			1154 Centre St.	✓	
555 Columbia Rd.	✓	✓	Jamaica Plain, MA 02130		
Dorchester, MA 02125			125 Nashua St.	✓	
557 Boylston Street	✓	✓	Boston, MA 02110		
Boston, MA 02116			130 Dartmouth St.	✓	
557 Tremont Street	✓	✓	Boston, MA 02116		
Boston, MA 02118			145 Dartmouth St.	✓	
6 Tremont Street	✓	✓	Boston, MA 02116		
Boston, MA 02108			1515 Dorchester Ave.	✓	
60 State Street	✓	✓	Dorchester, MA 02122		
Boston, MA 02109			161 Massachusetts Ave.	✓	
618 Washington Street	✓	✓	Boston, MA 02115		
Dorchester, MA 02124			1762 Washington St.	✓	
636 East Broadway	✓	✓	Boston, MA 02118		
Boston, MA 02127			19 Logan Airport East	✓	
65 Franklin Street	✓	✓	Boston, MA 02128		
Boston, MA 02110			2 Atlantic Ave.	✓	
677 Centre Street	✓	✓	Boston, MA 02110		
Boston, MA 02130			200 Portland St.	✓	
699 Boylston Street	✓	✓	Boston, MA 02114		
Boston, MA 02116			201 Brookline Ave.	✓	
710 Washington Street	✓	✓	Boston, MA 02215		
Boston, MA 02111			221 Massachusetts Ave.	✓	
740 Gallivan Blvd.	✓	✓	Boston, MA 02115		
Boston, MA 02122			243 Charles St.	✓	
771 Commonwealth Ave.	✓	✓	Boston, MA 02114		



248 Broadway St. Chelsea, MA 02150	✓	630-672 American Legion Hwy. Roslindale, MA 02131	✓
249 Ruggles St. Boston, MA 02119	✓	65 Rear Boston Rd Dorchester, MA 02125	✓
283 Causeway St. Boston, MA 02114	✓	660 Beacon St. Boston, MA 02215	✓
30 Rowes Wharf Boston, MA 02110	✓	700 Commonwealth Ave. Boston, MA 02134	✓
300 Terminal C Rd East Boston, MA 02128	✓	730 Atlantic Ave. Boston, MA 02110	✓
300 The Fenway Boston, MA 02115	✓	745 Boylston St. Boston, MA 02116	✓
31 St. James Ave. Boston, MA 02116	✓	77 Massachusetts Ave. Cambridge, MA 02138	✓
3-11 Porter St. East Boston, MA 02128	✓	775 Commonwealth Ave. Boston, MA 02134	✓
32 Fruit St. Wang Bldg Boston, MA 02114	✓	8 Allstate Rd Dorchester, MA 02125	✓
332 Congress St. Boston, MA 02210	✓	80 Boylston St. Boston, MA 02116	✓
346 Huntington Ave. Boston, MA 02115	✓	800 Boylston St. Boston, MA 02116	✓
350 Chestnut Hill Ave. Brighton, MA 02135	✓	84 Massachusetts Ave. Cambridge, MA 02139	✓
360 Huntington Ave. Boston, MA 02155	✓	881 Commonwealth Ave. Boston, MA 02215	✓
393 Massachusetts Ave. Boston, MA 02118	✓	90 Massachusetts Ave. Boston, MA 02115	✓
39-59 Warren St. Roxbury, MA 02119	✓	9-15 Poplar St. Roslindale, MA 02131	✓
4 Commercial St. Boston, MA 02109	✓	957 Commonwealth Ave. Boston, MA 02134	✓
45 Charles St. Boston, MA 02108	✓	American Airlines Logan International Airport East Boston, MA 02128	✓
465 Columbus Ave. Boston, MA 02116	✓	Forest Hills Jamaica Plain, MA 02130	✓
47 Maverick Square East Boston, MA 02128	✓	Logan International Airport East Boston, MA 02128	✓
470-483 Blue Hill Ave. Dorchester, MA 02121	✓	One Financial Center Boston, MA 02111	✓
48-50 Salem St. Boston, MA 02113	✓	One Harborside Dr. East Boston, MA 02128	✓
550 Huntington Ave. Boston, MA 02115	✓	Terminal B 200 Logan International Airport East Boston, MA 02128	✓
58 Winter St. Boston, MA 02110	✓	Tremont St. Roxbury, MA 02120	✓
599 Washington St. Dorchester, MA 02124	✓	Zero Post Office Square Boston, MA 02109	✓
601 Congress St. Boston, MA 02210	✓	FSB: Full Service Branch	
610 Rear Huntington Ave. Boston, MA 02115	✓		
621 Huntington Ave. Boston, MA 02115	✓		



Year-Over-Year at a Glance

HMDA And Low-Income Loans

While Bank of America's HMDA applications and originations more than doubled from 2004-2005, the number of low-income loan applications and originations remained constant.¹⁸

In 2006, HMDA originations rose 41%, and low-income loan originations rose 36%. HMDA originations rose a further 28% in 2007, though low-income originations fell by nearly half.⁵³

	2005	2006	2007
HMDA Applications Received	1838	2616	3613
HMDA Loans Originated	1319	1860	2416
Low-Income Applications Received	74	101	56
Low-Income Loans Originated	47	64	34

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			
	2005	2006	2007
Low	3.6%	2.5%	1.8%
Moderate	4.2%	1.2%	1.0%
Middle	3.8%	0.8%	0.6%
Upper	4.9%	1.5%	1.1%
Total	4.1%	1.3%	1.0%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2005	2006	2007
Low	5.9%	13.5%	22.5%
Moderate	7.9%	6.9%	7.7%
Middle	10.4%	6.0%	4.8%
Upper	8.9%	13.5%	15.3%
Total	8.3%	9.3%	11.0%

Please refer to the addendum [The 2007 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 2007 is also compared to the 2007 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 2007 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 [The 2007 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

⁵³ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.



Source Documents

Bank of America Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency; December 31, 2006.

Bank of America Annual Report 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

FDIC Institution Directory:

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

Bank of America website:

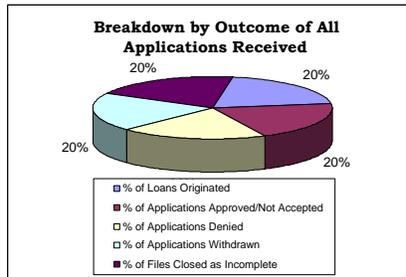
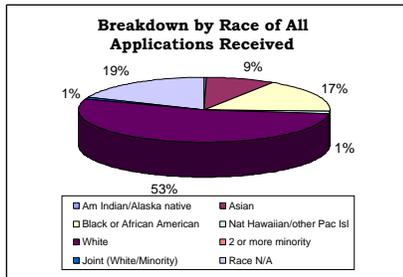
<http://www.bankofamerica.com>

Bank of America, N.A. HMDA Mortgage Lending

2007

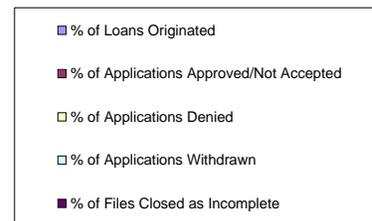
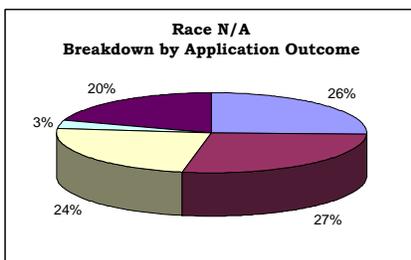
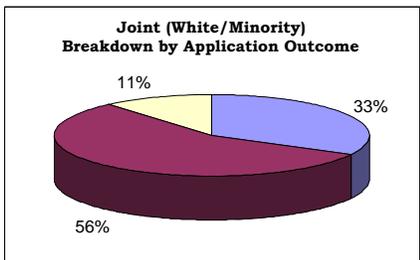
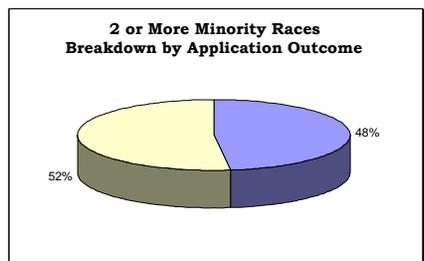
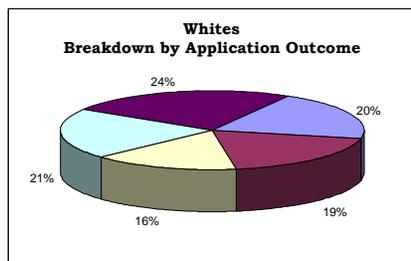
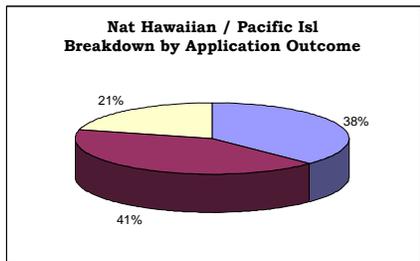
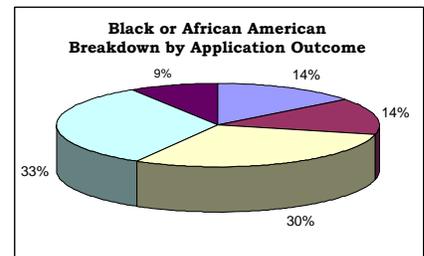
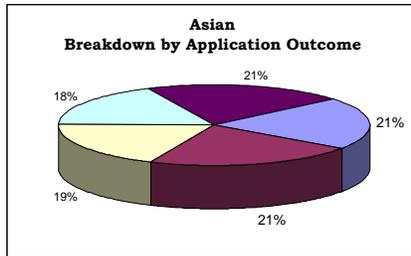
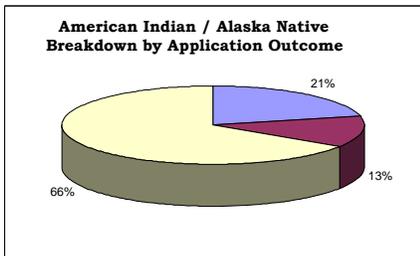
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	13	0%	7	0%	1	0%	5	1%	0	0%	0	0%
Asian	316	9%	214	9%	52	9%	44	8%	3	8%	3	9%
Black or African American	604	17%	345	14%	80	14%	163	29%	13	33%	3	9%
Nat Hawaiian/other Pac Isl	43	1%	31	1%	8	1%	4	1%	0	0%	0	0%
White	1922	53%	1335	55%	299	53%	242	43%	23	58%	23	68%
2 or more minority	5	0%	4	0%	0	0%	1	0%	0	0%	0	0%
Joint (White/Minority)	37	1%	25	1%	10	2%	2	0%	0	0%	0	0%
Race N/A	673	19%	455	19%	115	20%	97	17%	1	3%	5	15%
Total	3613	100%	2416	100%	565	100%	558	100%	40	100%	34	100%

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



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

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

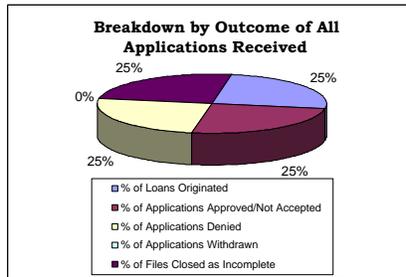
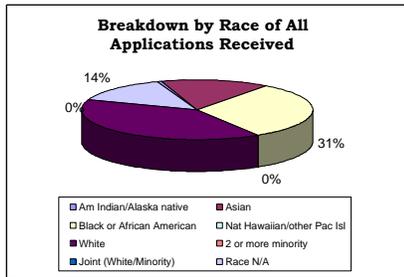


Bank of America, N.A. Low-Income Mortgage Lending

2007

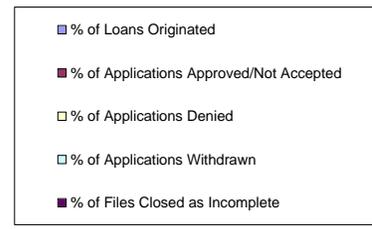
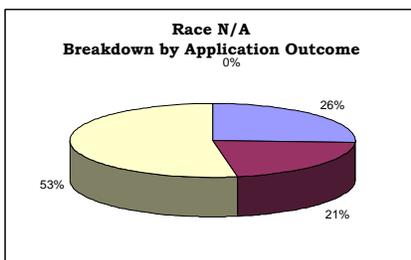
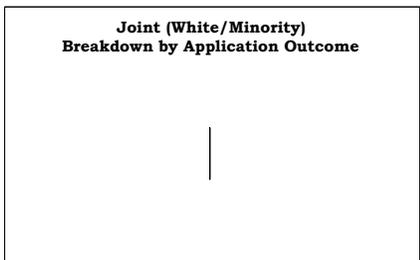
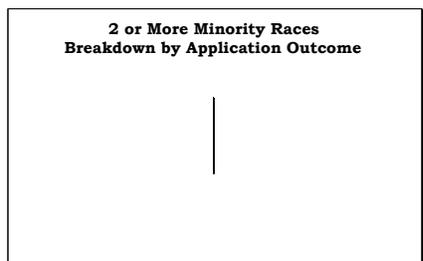
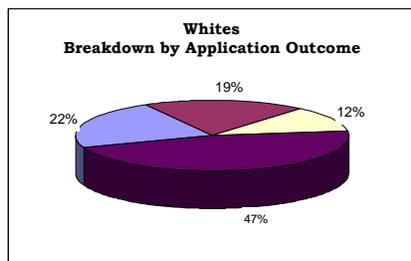
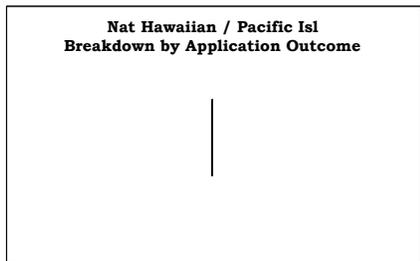
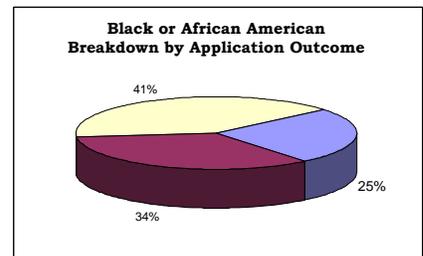
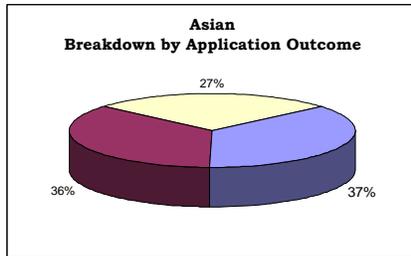
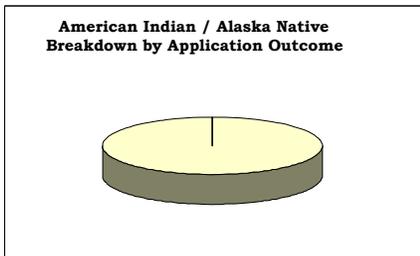
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	1	1%	0	0%	0	0%	1	2%	0	0%	0	0%
Asian	25	15%	15	17%	2	17%	8	13%	0	0%	0	0%
Black or African American	51	31%	22	25%	4	33%	25	40%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	65	39%	43	48%	5	42%	16	25%	0	0%	1	100%
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	23	14%	9	10%	1	8%	13	21%	0	0%	0	0%
Total	165	100%	89	100%	12	100%	63	100%	0	0%	1	100%

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.



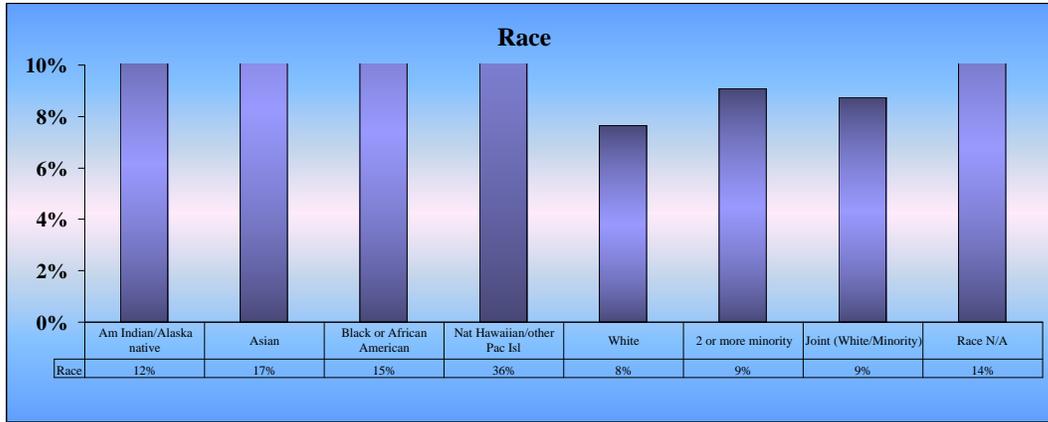
Compared against the MSA Aggregate Total

2007

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	13	12%	7	18%	1	33%	5	15%	0	0%	0	0%
Asian	316	17%	214	16%	52	29%	44	22%	3	2%	3	7%
Black or African American	604	15%	345	19%	80	19%	163	12%	13	4%	3	2%
Nat Hawaiian/other Pac Isl	43	36%	31	42%	8	73%	4	17%	0	0%	0	0%
White	1922	8%	1335	8%	299	14%	242	8%	23	1%	23	5%
2 or more minority	5	9%	4	9%	0	0%	1	17%	0	0%	0	0%
Joint (White/Minority)	37	9%	25	8%	10	34%	2	5%	0	0%	0	0%
Race N/A	673	14%	455	17%	115	20%	97	10%	1	0%	5	3%
Total	3613	10%	2416	10%	565	17%	558	10%	40	2%	34	4%

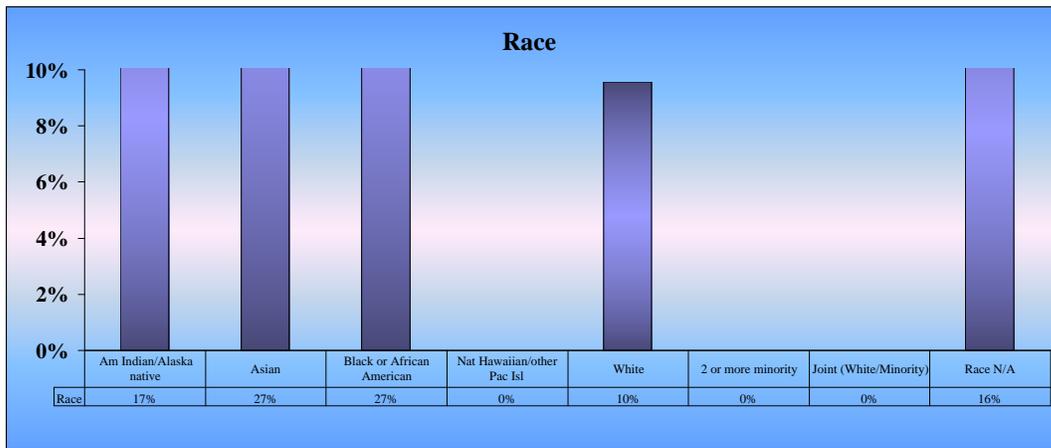
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Bank of America Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	1	17%	0	0%	0	0%	1	25%	0	0%	0	0%
Asian	25	27%	15	23%	2	40%	8	53%	0	0%	0	0%
Black or African American	51	27%	22	27%	4	36%	25	29%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	65	10%	43	10%	5	12%	16	13%	0	0%	1	5%
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	23	16%	9	19%	1	11%	13	25%	0	0%	0	0%
Total	165	15%	89	14%	12	18%	63	22%	0	0%	1	4%

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





Employment Information

No data available





Boston Private Bank



**BOSTON PRIVATE BANK
& TRUST COMPANY**

Boston Private Bank Overview

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

Description

Boston Private Bank & Trust Company is a \$2.76 billion stock-owned financial institution. The bank is a subsidiary of Boston Private Financial Holdings, a publicly traded five-bank holding company founded in 1987.

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.

Principal Officers

CEO

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

CFO

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

Chief Compliance Officer

Esther Schlorholtz
10 Post Office Square
Boston, MA 02109
617-912-1900

Employees

Number of Employees	278 ⁵⁴
Number of Employees in Massachusetts	278
Percentage of Women Employees	59%
Percentage of Minority Employees	17%

Branches

Number of Branches - Total	10
Branches Within Boston PSMA	4
Number of ATMs	14
Number of Free-Standing ATMs	4

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2008
Overall Rating	OUTSTANDING⁵⁵
Lending Test Rating	OUTSTANDING
Investment Test Rating	OUTSTANDING
Service Test Rating	OUTSTANDING

⁵⁴ FDIC Institution Directory

⁵⁵Based on most recent CRA Performance Evaluation by FDIC published 2008.



Discussion

Overall rating: OUTSTANDING⁵⁶

Lending Test

**Lending Test Rating:
OUTSTANDING⁵⁷**

General Responsiveness to Credit Needs

Boston Private Bank's lending levels reflect excellent responsiveness to the assessment area's credit needs. The bank actively originates home mortgage, small business, and community development loans in its assessment area.⁵⁸

The bank's access to Community Development Advance (CDA) funds from the Federal Home Loan Bank of Boston (FHLBB) has contributed to its ability to fund community development projects and to provide financing to the area's residents and small businesses. During the CRA evaluation period, Boston Private Bank disbursed over \$86 million in CDA funds—discounted loans from the FHLBB for financing eligible affordable-housing, economic-development, and mixed-use initiatives. Included in the total CDA funding was approximately \$70 million to finance home mortgages for low- and moderate- income homebuyers under the Soft Second loan program.⁵⁹

Boston Private Bank & Trust Company has traditionally been a very active lender, especially of home-purchase loans.

Responsiveness to Low- and Moderate-Income Credit Needs

Boston Private Bank achieved an excellent penetration among retail customers of different income levels and businesses of different sizes. Of particular note is that the bank's proportion of lending to low- and moderate-income borrowers far exceeded the aggregate.⁶⁰

The bank's residential lending data reflects excellent penetration among the area's low-,

moderate-, middle-, and upper-income borrowers, particularly low- and moderate-income borrowers. Moderate-income borrowers accounted for the highest single share of total loans. Notably, the percentage of lending to moderate-income borrowers far exceeded the percentage of moderate-income families in the area. The bank had a particularly strong penetration in the home purchase category to these borrowers. The proportion of loans to low-income borrowers was below the percentage of low-income families in the assessment area; however, the volume of lending to low-income borrowers (especially in the home purchase category) was impressive given the area's high housing costs.

The geographic distribution of loans reflects an excellent dispersion throughout the area. The geographic distribution of the HMDA loans reflects excellent dispersion throughout the assessment area's low-, moderate-, middle-, and upper-income census tracts. Notably, the percentage of total loans in the moderate-income census tracts was nearly twice the percentage of owner-occupied housing located in those areas.⁶¹

The low-income census tracts accounted for a comparatively modest volume of loans, but the percentage of loans in low-income areas is quite impressive given that those areas account for just 1.8 percent of the assessment area's owner occupied housing. Especially noteworthy is the strong percentage of home purchase loans in the low-income census tracts.

Leadership in Community-Development Loans

Boston Private Bank is a leader in making community development loans. During the evaluation period, the bank originated 43 community development loans totaling \$86.4 million. During the previous CRA evaluation period, the bank originated 41 community development loans totaling \$50.0 million.⁶²

In 2007, the bank originated \$27 million in community-development loans, of which \$12 million was for affordable housing for low- and moderate-income individuals.

⁵⁶ Based on most recent CRA Performance Evaluation by FDIC published 2008.

⁵⁷ Ibid.

⁵⁸ Ibid.

⁵⁹ Ibid.

⁶⁰ Ibid.

⁶¹ Ibid.

⁶² Ibid.



Innovative & Flexible Lending Practices

The bank makes extensive use of innovative and flexible lending practices to better meet the assessment area’s credit needs. It offers various special mortgage loan programs tailored to assist either lower-income people or first-time homebuyers in pursuing or maintaining home ownership. These have substantially contributed to the bank’s success in originating loans to borrowers of low and moderate income.

The bank is effectively using Soft Second mortgage loan programs to assist applicants in obtaining homeownership. Boston Private Bank has been consistently ranked the number-one Soft Second mortgage lender in Boston, and is among the top five lenders for Massachusetts overall.

The bank also originates loans through MassHousing loan programs. MassHousing is a quasi-public state agency whose mission is to increase the state’s supply of affordable housing. MassHousing offers a number of different loan programs geared toward low- and moderate-income borrowers that feature low interest rates and flexible underwriting standards. The bank originated 71 MassHousing program loans totaling \$13.8 million during the CRA evaluation period.

The bank has made extensive use of Equity Builder funds from the Federal Home Loan Bank of Boston to assist low- and moderate-income borrowers in purchasing a home. The Equity Builder funds provide borrowers with down payment and closing cost assistance, thereby helping consumers who might not otherwise qualify for financing to obtain a home.

Boston Private Bank works with the City of Boston Department of Neighborhood Development on its Foreclosure Prevention Initiative and 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 also 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 out to low- and moderate-income homebuyers.

Investment Test

Investment Test Rating:
OUTSTANDING⁶³

Boston Private Bank has an excellent level of qualified community development investments and grants. The bank’s qualified investments demonstrate an excellent responsiveness to the area’s economic development needs. In addition, Boston Private Bank makes significant use of innovative or complex investments to support community development initiatives.⁶⁴

Boston Private Bank has \$24.2 million in qualified investments and grants. The bank has also provided in-kind donations of undeterminable value to local non-profit community development organizations. Furthermore, the bank has investment commitments of just over \$1 million.

Community Development Investments & Grants

The bank’s qualified investments and grants exhibit an excellent responsiveness to the area’s credit and community development needs. In addition, the bank’s substantial contributions to local charitable and social service organizations demonstrate a commitment to the local area’s welfare.

Boston Private Bank makes significant use of innovative or complex investments to support community development initiatives. Many of the investments purchased by the bank have characteristics that make them less likely to be routine investments. Characteristics such as complexity, unusual risk factors, generally lower return expectations, complicated tax structures and underwriting, and long-term administrative costs make the investments less likely to be funded by other corporations.

As of December 31, 2007, Boston Private Bank has 22 qualified Community Development Investments with a current book value of \$23.3

⁶³ Based on most recent CRA Performance Evaluation by FDIC published 2008.

⁶⁴ Ibid.



million. This equates to 0.8% of total assets and 4.1% of investments. Seven of the investments with an original purchase value of \$7.7 million represent new acquisitions since the prior FDIC CRA evaluation.

The bank has provided \$879,453 in grants and donations to organizations that provide education and training, affordable housing, youth programs, and health and human services to lower-income residents. For the evaluation period, cash donations as a percent of pre-tax NOI was 1.0 percent.

Service Test

Service Test Rating: OUTSTANDING⁶⁵

Description of Service-Delivery Systems

Boston Private Bank's delivery systems are accessible to essentially all portions of the assessment area. Although the branch network is somewhat limited given the size of the assessment area, alternative delivery systems are available to help compensate for any immediate lack of access to banking facilities.⁶⁶

Boston Private Bank has a limited network, consisting of 4 branches within the Boston MSA. The bank also offers banking online and by phone. Services do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and/or individuals.

There were no branch closings during the assessment period.

Community Development Services

The bank is a leader in providing community development services.

Approximately 35 officers and employees of the bank are involved in nearly 50 local community development and nonprofit organizations in various capacities. Boston Private Bank personnel serve as directors, officers, committee members, and volunteers, and provide many services such as fundraising, public relations, finance, and administrative support. In many

cases, involvement in these organizations has led to loans and grants.⁶⁷

The CRA officer and a CRA associate served on Boston Mayor Menino's Foreclosure Prevention Task Force which is charged with developing strategies to address escalating foreclosure rates in the City of Boston.

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 2005 to 2007, for example, the bank's President and 21 other staff members taught 24 four-session financial literacy classes to elementary, middle, and high school students in the Boston Public Schools and to various community organizations. Each of the schools involved in the training primarily serves students from low- and moderate-income families.

The bank's loan officers regularly collaborate with non-profit agencies in providing first time homebuyer counseling classes. The non-profit agencies have included, for example, the Allston-Brighton CDC, Urban Edge, the City of Cambridge, City Life/Vida Urbana, and the Lynn Housing Authority. Loan officers offer information on mortgage products, what homeowners may expect during the mortgage financing process, and budgeting. Classes are available in English and Spanish and translations into Chinese are also offered. Since 2005, Boston Private Bank staff has presented 96 first time homebuyer programs to 2,589 individuals.

The bank participates in training sessions for small businesses on financing businesses and alternative sources of financing, and other issues that impact small businesses. Bank loan officers also participate on panels that provide technical assistance on banking to small businesses.

Boston Private Bank staff members assist local nonprofit housing organizations in completing applications for funding through the FHLBB's Affordable Housing Program. Bank staff assisted local non-profit organizations with at least four such applications since January 2005, two of which resulted in a FHLBB award. Completing

⁶⁵ Ibid.

⁶⁶ Ibid.

⁶⁷ Ibid.



the applications requires a significant commitment of time and expertise on the part of Boston Private Bank and approved applications require fund disbursement and monitoring by the bank.

The bank and its officers are also involved in a wide range of other community-development activities.

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	✓	✓

FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Boston Private Bank’s HMDA lending rose 17% in 2006, and a further 9% in 2007. Low-income numbers decreased each year between 2005 and 2007.⁶⁸

	2005	2006	2007
HMDA Applications Received	373	480	500
HMDA Loans Originated	334	393	429
Low-Income Applications Received	67	68	49
Low-Income Loans Originated	64	56	45

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			
	2005	2006	2007
Low	1.0%	0.9%	0.7%
Moderate	0.2%	0.1%	0.2%
Middle	0.4%	0.3%	0.3%
Upper	1.7%	1.0%	1.2%
Total	0.7%	0.5%	0.5%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2005	2006	2007
Low	4.8%	7.8%	6.1%
Moderate	5.3%	1.0%	4.8%
Middle	2.5%	4.2%	3.6%
Upper	9.2%	11.5%	13.6%
Total	5.5%	5.9%	6.9%

Please refer to the addendum The 2007 Linked Deposit Banking Report to the Mayor

⁶⁸ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.



Addendum: Small Business Loans for details on small business loans. The small business loan activity for Boston Private Bank in the year 2007 is also compared to the 2007 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 2007 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 The 2007 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; February 5, 2008.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

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

Boston Private Wealth Management Group
Annual Report 2007

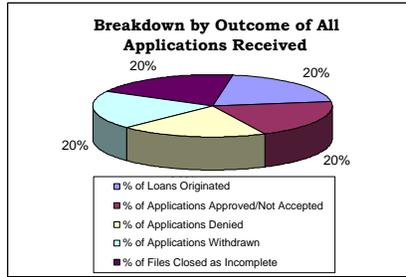
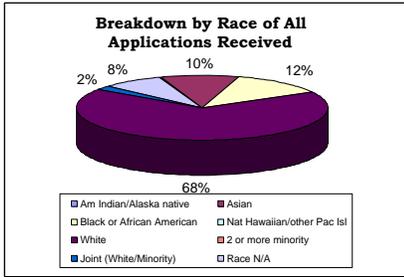
Boston Private Bank website:
<http://www.bostonprivatebank.com/>

Boston Private Bank HMDA Mortgage Lending

2007

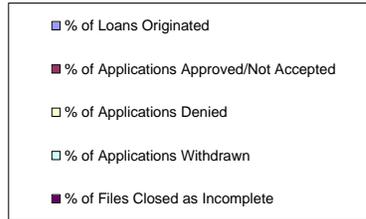
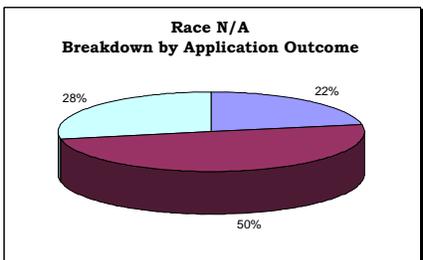
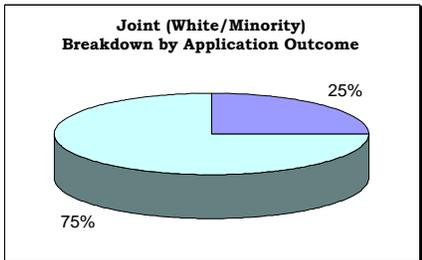
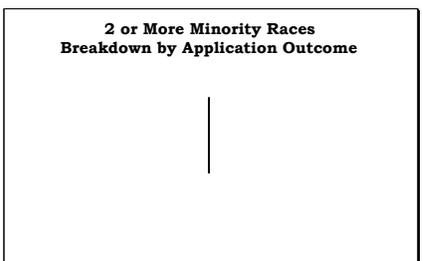
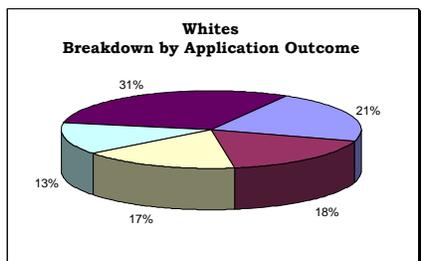
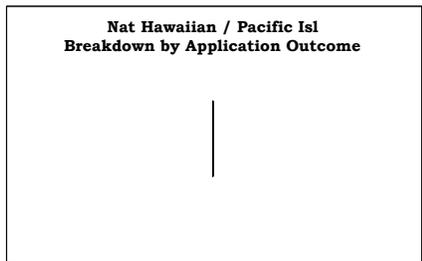
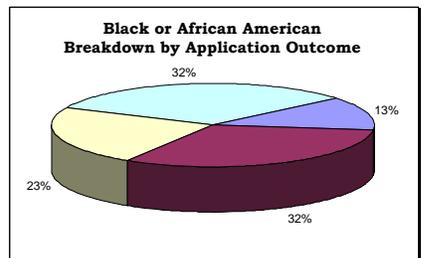
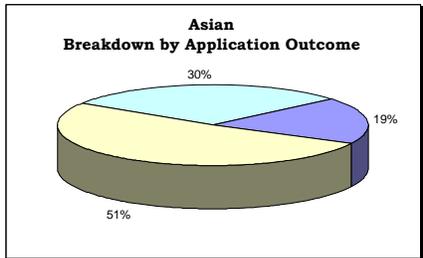
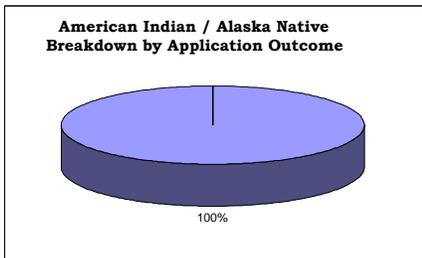
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	2	0%	2	0%	0	0%	0	0%	0	0%	0	0%
Asian	50	10%	42	10%	0	0%	3	27%	5	16%	0	0%
Black or African American	60	12%	44	10%	6	25%	2	18%	8	25%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	338	68%	300	70%	14	58%	6	55%	14	44%	4	100%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	11	2%	9	2%	0	0%	0	0%	2	6%	0	0%
Race N/A	39	8%	32	7%	4	17%	0	0%	3	9%	0	0%
Total	500	100%	429	100%	24	100%	11	100%	32	100%	4	100%

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.

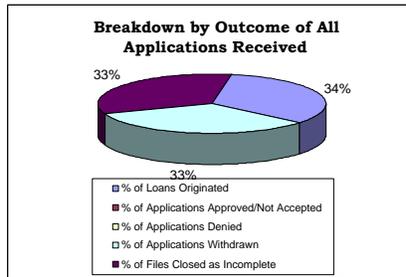
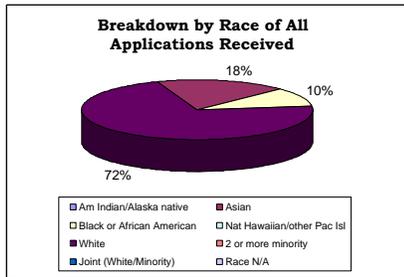


Boston Private Bank Low-Income Mortgage Lending

2007

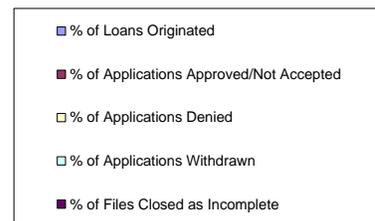
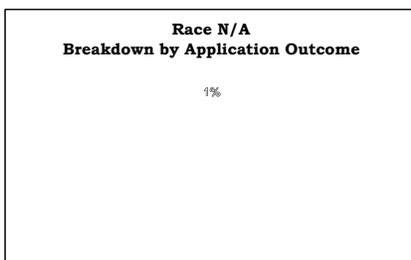
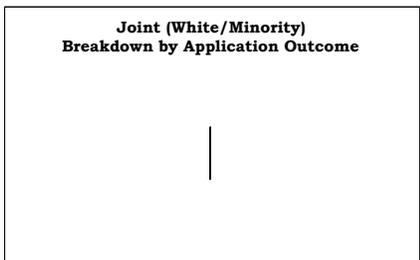
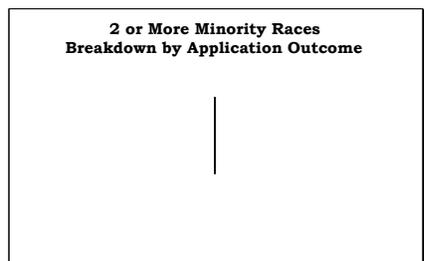
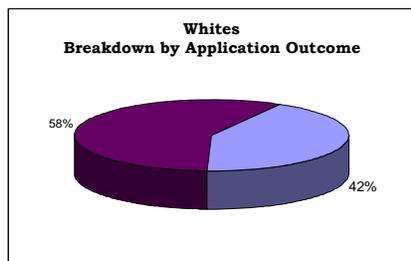
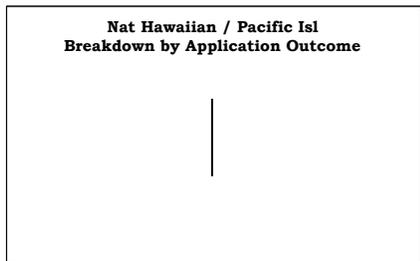
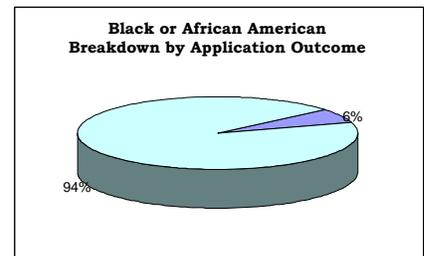
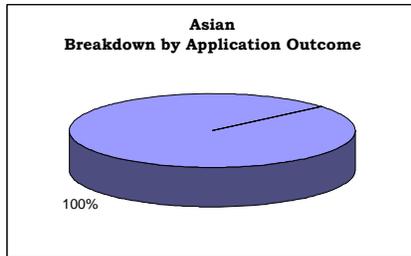
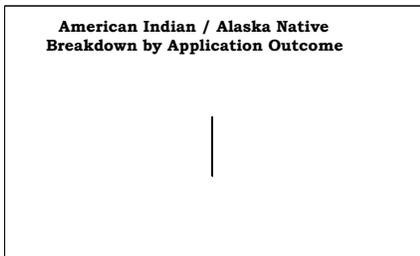
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	9	18%	9	20%	0	0%	0	0%	0	0%	0	0%
Black or African American	5	10%	3	7%	0	0%	0	0%	2	100%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	35	71%	33	73%	0	0%	0	0%	0	0%	2	100%
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	49	100%	45	100%	0	0%	0	0%	2	100%	2	100%

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.



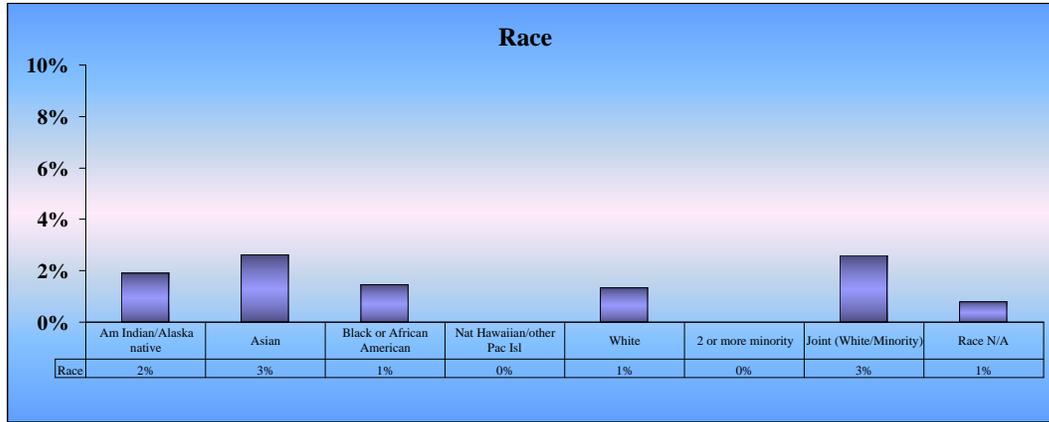
Compared against the MSA Aggregate Total

2007

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	2	2%	2	5%	0	0%	0	0%	0	0%	0	0%
Asian	50	3%	42	3%	0	0%	3	1%	5	4%	0	0%
Black or African American	60	1%	44	2%	6	1%	2	0%	8	3%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	338	1%	300	2%	14	1%	6	0%	14	1%	4	1%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	11	3%	9	3%	0	0%	0	0%	2	9%	0	0%
Race N/A	39	1%	32	1%	4	1%	0	0%	3	1%	0	0%
Total	500	1%	429	2%	24	1%	11	0%	32	1%	4	1%

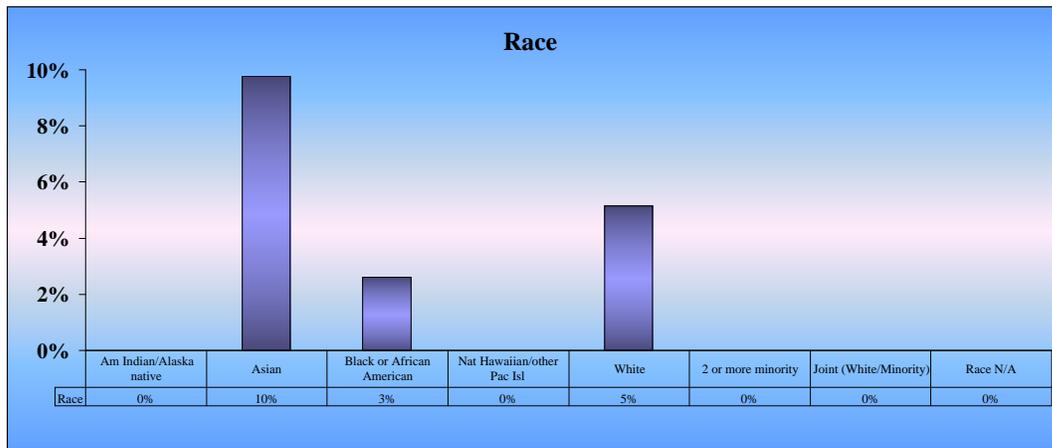
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



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	10%	9	14%	0	0%	0	0%	0	0%	0	0%
Black or African American	5	3%	3	4%	0	0%	0	0%	2	17%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	35	5%	33	8%	0	0%	0	0%	0	0%	2	10%
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	49	4%	45	7%	0	0%	0	0%	2	2%	2	7%

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.



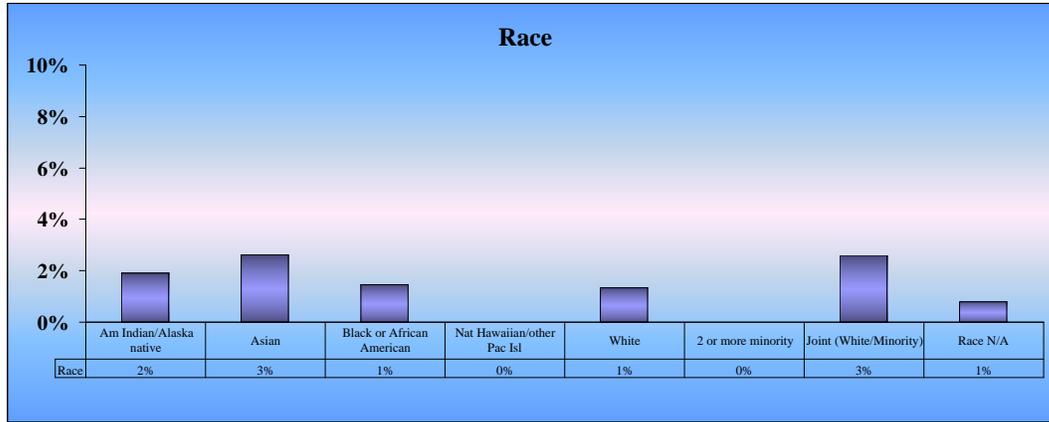
Compared against the MSA Aggregate Total

2007

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	2	2%	2	5%	0	0%	0	0%	0	0%	0	0%
Asian	50	3%	42	3%	0	0%	3	1%	5	4%	0	0%
Black or African American	60	1%	44	2%	6	1%	2	0%	8	3%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	338	1%	300	2%	14	1%	6	0%	14	1%	4	1%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	11	3%	9	3%	0	0%	0	0%	2	9%	0	0%
Race N/A	39	1%	32	1%	4	1%	0	0%	3	1%	0	0%
Total	500	1%	429	2%	24	1%	11	0%	32	1%	4	1%

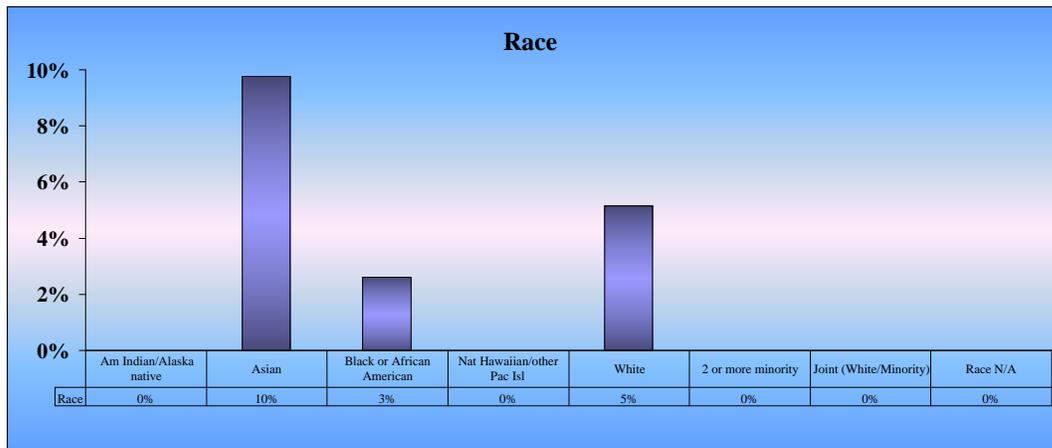
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



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	10%	9	14%	0	0%	0	0%	0	0%	0	0%
Black or African American	5	3%	3	4%	0	0%	0	0%	2	17%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	35	5%	33	8%	0	0%	0	0%	0	0%	2	10%
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	49	4%	45	7%	0	0%	0	0%	2	2%	2	7%

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
Los Angeles, California 90012

Description

Cathay Bank is a \$10.4 billion commercial bank headquartered in Los Angeles, California. It is wholly owned by Cathay General Bancorp (Nasdaq: CATY), a one-bank holding company. The bank operates a total of 50 branch offices in seven states, including one branch in Massachusetts, and a branch in Hong Kong.

Cathay Bank is primarily a commercial lender. The majority of its loans are commercial mortgage loans (56% of total loans), commercial loans (20%), and real estate construction loans (12%).

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. The 2007 FDIC report represents the bank's first CRA review post-merger.

Cathay Bank Principal Officers

Chairman, President, and CEO

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

CFO

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

COO

Peter Wu
777 North Broadway
Los Angeles, California 90012
(213) 625-4700

Employees

Number of Employees	1051 ⁶⁹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	51
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	2007
Overall Rating	SATISFACTORY⁷⁰
Lending Test Rating	High Satisfactory
Investment Test Rating	Low Satisfactory
Service Test Rating	High Satisfactory

⁶⁹ FDIC Institution Directory

⁷⁰ Based on most recent CRA Performance Evaluation by FDIC published 2007.



Discussion

**Overall rating for Massachusetts:
SATISFACTORY⁷¹**

Lending Test

**Lending Test Rating for Massachusetts:
HIGH SATISFACTORY⁷²**

Loans subject to HMDA reporting requirements represent a very nominal portion of overall lending in the Boston assessment area, which is consistent with the bank's lending strategy in this region. Home mortgage loans were not included in the most recent CRA review, because the bank did not originate a sufficient number of home mortgage loans in Massachusetts to develop a meaningful analysis.

General Responsiveness to Credit Needs

Cathay Bank's lending levels reflect an overall good responsiveness to community credit needs. The overall geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrowers reflects, given the product lines offered by the institution, good penetration among business customers of different sizes. The bank has made a low level of community development loans in Massachusetts.⁷³

Responsiveness to Low- and Moderate-Income Credit Needs

The bank exhibits a good record of serving the credit needs of the most economically disadvantaged areas within the Boston assessment area and very small businesses consistent with safe and sound banking practices. A majority of small business loans was made to businesses with gross annual revenue of \$1 million or less, which exceeded the aggregate lending data. In addition, the geographic distribution analysis of small business loans reflects that the bank's performance in low-income areas greatly exceeded the aggregate lending data.

Community Development Lending

The bank has made a low level of community development loans in the State of Massachusetts. During the review period, Cathay Bank extended only two community development loans in Massachusetts, totaling approximately \$10.7 million. Both community development loans originated were for the purpose of providing affordable housing.⁷⁴

The majority of the bank's CDL dollars (\$338 million out of \$535 million) is spent in its California assessment areas.

Innovative and/or Flexible Lending Practices

Cathay Bank makes use of flexible lending practices in order to serve Boston assessment area credit needs. These include the Smart Capital Line of Credit and Small Business Administration's 7(a) loan program, both targeted at small business owners; and the bank's Community Homebuyers Loan Program, targeted to first-time homebuyers.

Although these programs are not considered innovative, they contain flexible lending terms to assist borrowers who would otherwise not qualify for traditional banking products.

Investment Test

**Investment Test Rating for
Massachusetts: LOW
SATISFACTORY⁷⁵**

Cathay Bank has an adequate level of qualified community development investments and grants in the Boston assessment area. The level and types of qualified investments held by the bank exhibit an adequate responsiveness to credit and community economic development needs. In addition, the bank occasionally uses complex investments to support community development initiatives, including affordable housing.⁷⁶

During the review period, the bank invested \$5 million in a Low-Income Housing Tax Credit partnership in Boston. The tax credit helps provide affordable housing in Boston. The bank also made five qualified grants/donations that

⁷¹ Based on most recent CRA Performance Evaluation by FDIC published 2007.

⁷² Ibid.

⁷³ Ibid.

⁷⁴ Ibid.

⁷⁵ Ibid.

⁷⁶ Ibid.



benefited Boston communities, totaling approximately \$45,000.

The bank's investment activities in Boston represent 7.0% of the dollar volume of total investment activities in all other assessment areas.

Service Test

Service Test Rating for Massachusetts:
HIGH SATISFACTORY⁷⁷

Delivery systems are reasonably accessible to essentially all portions of the Boston assessment area. The bank has provided an adequate level qualified community development services in Boston during the review period.⁷⁸

Description of Service-Delivery Systems

Cathay Bank maintains ATM facilities at 31 of its 43 branch offices. The bank's network includes access to the Plus, Cirrus, Star, MasterCard and VISA networks, all of which provide additional access to non-proprietary ATMs.

Alternative delivery systems include Cathay eBanking, Cathay eCashManagement Services, and Telephone Banking.

Cathay Bank's presence in Massachusetts was the result of a merger with General Bank in October 2003. The bank opened one branch and closed two branches in Massachusetts in April 2005. Both the two closed branches and the one opened branch were located in low-income geographies. The change has not had a negative impact on the accessibility of the bank's delivery systems.

The bank's one Massachusetts branch is located in a low-income census tract.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
621 Washington Street Boston, MA 02111		✓

FSB: Full Service Branch

Community Development Services

Cathay Bank provides a high level of 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.⁷⁹

The bank's Boston community development services have included:

- Financial literacy training to students at an elementary school located in a low- and moderate-income neighborhood in Boston.
- A first-time homebuyer seminar, which presented information on the preparation for the purchase of a first home and information about financing.
- An informational seminar to prospective small business owners, teaching the basics of successfully obtaining small business financing.

In 2007, the Cathay Bank Foundation worked with the Boston EITC Action Coalition, a non-profit organization that provides free income tax preparation assistance through the Volunteer Income Tax Assistance (VITA)/Earned Income Tax Credit Program. This program helps Asian and other low-income immigrants and families to apply for eligible tax benefits.⁸⁰

⁷⁷ Based on most recent CRA Performance Evaluation by FDIC published 2007.

⁷⁸ Ibid.

⁷⁹ Ibid.

⁸⁰ Cathay Bank Annual Report 2007.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

Cathay Bank's two HMDA loans in 2005 represent the bank's first Boston HMDA loans since 2001. Lending levels remained low in 2006 and 2007. The bank has not made any low-income loans in Boston during the period 2001-2007.⁸¹

	2005	2006	2007
HMDA Applications Received	2	5	3
HMDA Loans Originated	2	5	3
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			
	2005	2006	2007
Low	0.3%	0.1%	0.3%
Moderate	0.0%	0.0%	0.0%
Middle	0.0%	0.0%	0.0%
Upper	0.0%	0.0%	0.0%
Total	0.1%	0.0%	0.1%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2005	2006	2007
Low	1.9%	0.7%	3.5%
Moderate	0.1%	0.1%	0.1%
Middle	0.0%	0.0%	0.0%
Upper	0.0%	0.3%	0.1%
Total	0.4%	0.2%	0.6%

Please refer to the addendum The 2007 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 2007 is also compared to the 2007 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 2007 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 The 2007 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

⁸¹ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2006.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; April 2, 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Cathay Bank 2007 Annual Report.

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

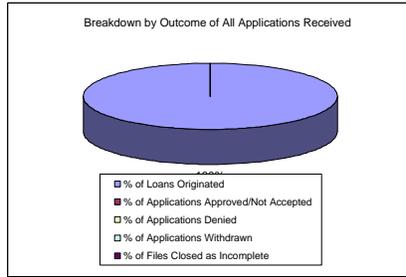
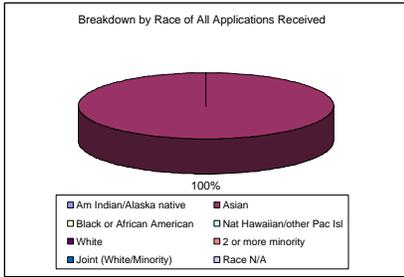
Cathay Bank website:
<http://www.cathaybank.com/>

Cathay General Bancorp HMDA Mortgage Information

2007

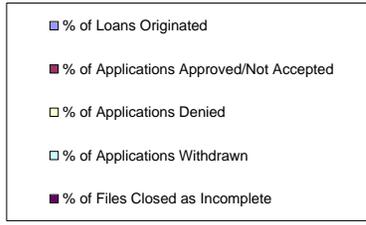
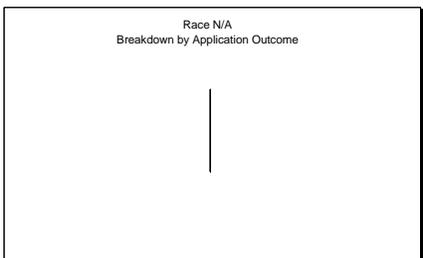
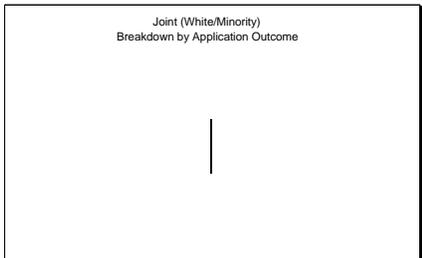
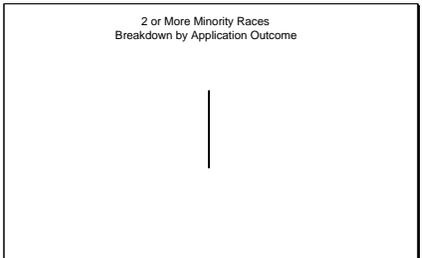
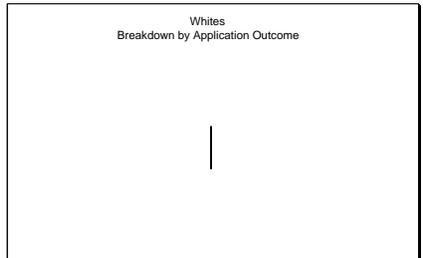
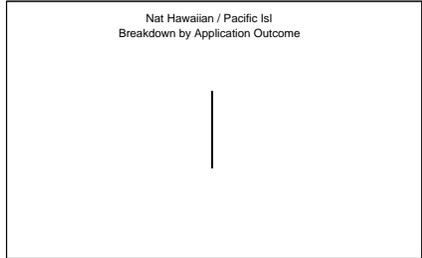
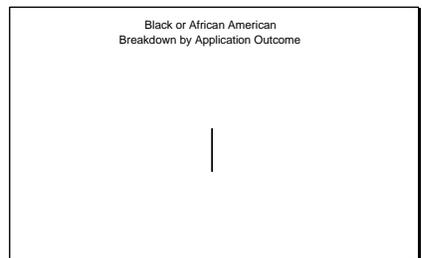
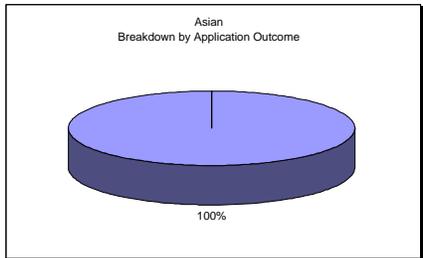
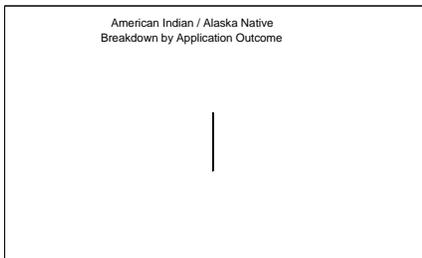
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of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

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



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

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



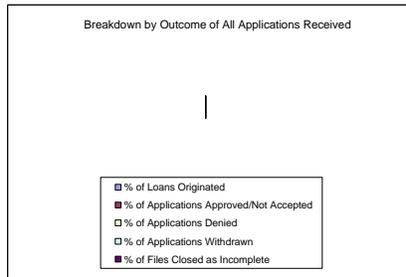
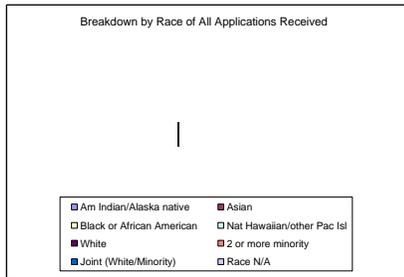
Cathay General Bancorp Low-Income Mortgage Information

Note: No Data Reported For "Less Than 50% OF MSA/MD Median"

2007

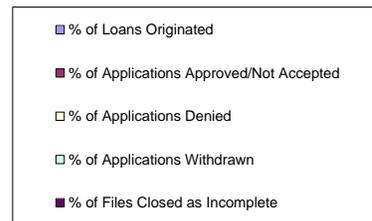
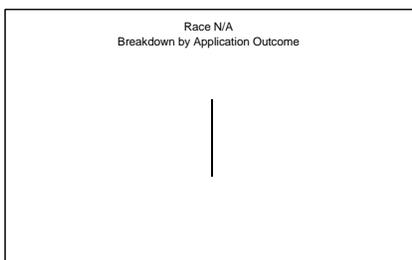
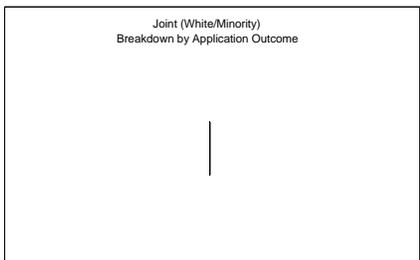
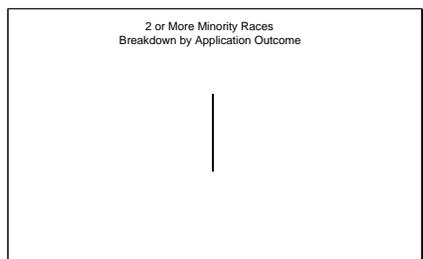
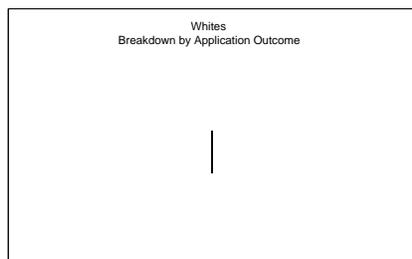
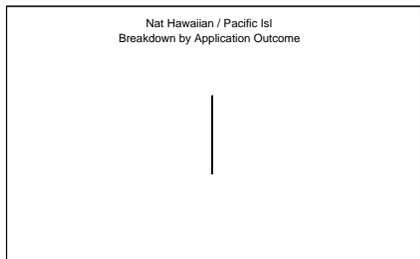
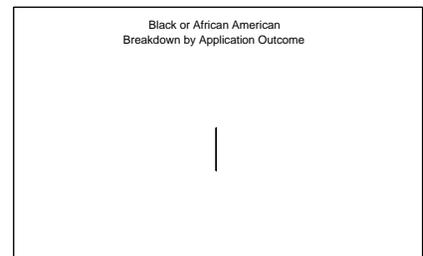
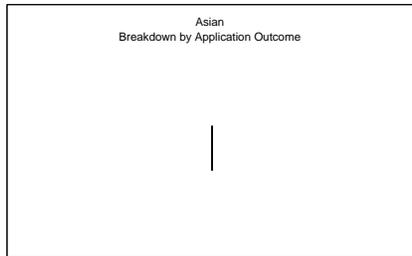
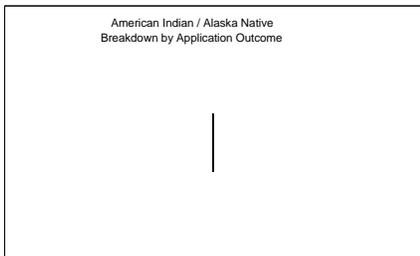
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of 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.



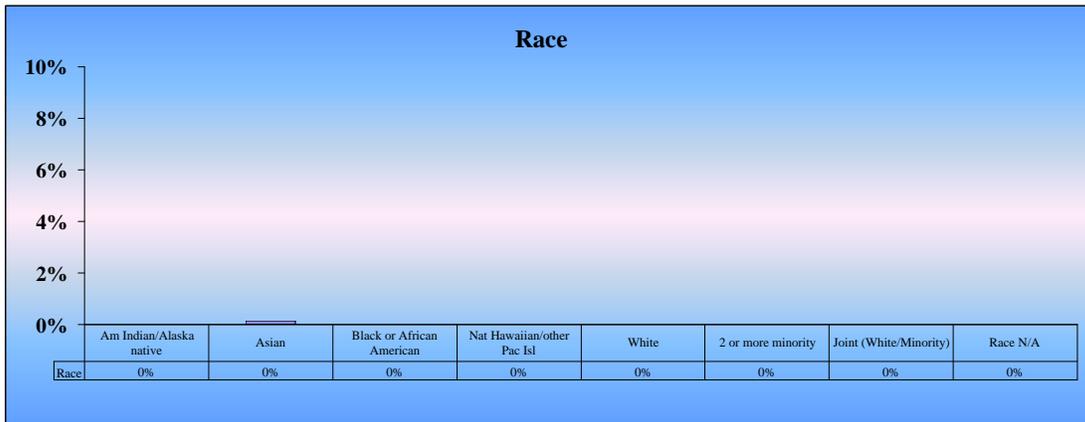
Compared against the MSA Aggregate Total

2007

Cathay General Bancorp HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	3	0%	3	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	3	0%	3	0%	0	0%	0	0%	0	0%	0	0%

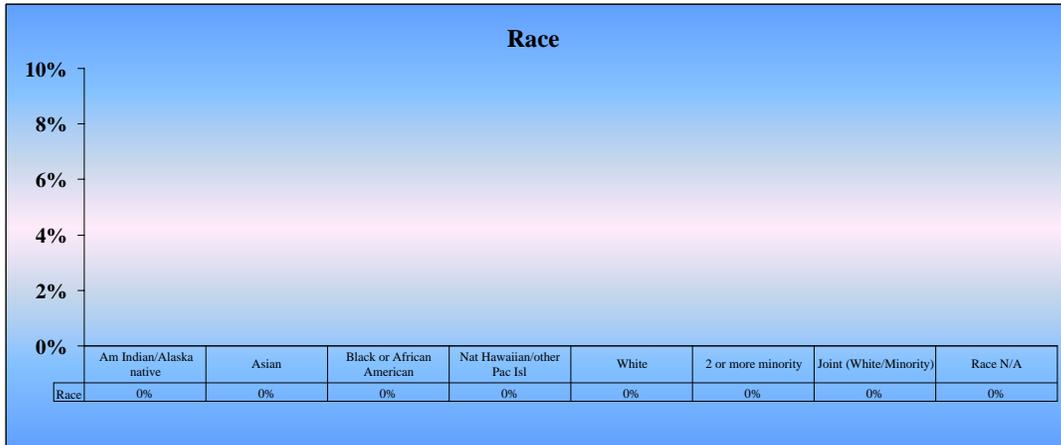
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Cathay General Bancorp Low-Income Mortgage Information

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

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





Employment Information

No data available





Century Bank & Trust



Century Bank
Banking for the New Century

Century Bank Overview

Century Bank & Trust
400 Mystic Avenue
Medford, MA 02155-6316

Description

Century Bank, headquartered in Medford, Massachusetts, is the wholly-owned subsidiary of Century Bancorp, Inc. The Bank has one wholly-owned subsidiary, Century Financial Services, Inc.

As of September 2007, the Bank had total assets of \$1.5 billion, gross loans of \$737 million and total deposits of \$1.1 billion. A substantial portion of the Bank's assets is in loans, representing 47.2 percent of total assets. The bank's loans are split evenly between commercial (53%) and residential (44.5%), with the greatest share of the bank's lending secured by Commercial Real Estate.

Principal Officers

Co-CEOs and Co-Presidents

Barry R. Sloane & Jonathan G. Sloane
400 Mystic Avenue
Medford, MA 02155
866-823-6887

CFO

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

Compliance Officer

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

Employees

Number of Employees	414
Number of Employees in Massachusetts	414 ⁸²
Percentage of Women Employees	69%
Percentage of Minority Employees	17%

Branches

Number of Branches - Total	21
Branches in Boston	5
Number of ATMs in Boston	9
Number of Free-Standing ATMs in Boston	4

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2007
Overall Rating	SATISFACTORY⁸³
Lending Test Rating	HIGH SATISFACTORY
Investment Test Rating	LOW SATISFACTORY
Service Test Rating	HIGH SATISFACTORY

⁸² FDIC Institution Directory

⁸³ Based on most recent CRA Performance Evaluation by FDIC published 2007.



Discussion

Overall rating: SATISFACTORY⁸⁴

Lending Test

Lending Test Rating: HIGH SATISFACTORY⁸⁵

General Responsiveness to Credit Needs

Overall, Century Bank's performance with respect to the Lending Test is High Satisfactory. The Bank's lending activity reflects a good responsiveness to assessment area credit needs with a high percentage of both small business loans and home mortgage loans within the assessment area.⁸⁶

Responsiveness to Low- and Moderate-Income Credit Needs

Overall, the Bank's lending to borrowers of different incomes and business of different sizes represents excellent penetration throughout the assessment area.

In 2006, 4.8% and 13.3% of home mortgage loans were made to low- and moderate-income individuals, respectively. Century Bank's performance among low-income borrowers falls short of the number of low-income families in the assessment area; however, in both 2005 and 2006, the Bank's performance exceeded that of the aggregate. In fact, in 2005, the Bank's performance doubled that of the aggregate. The Bank's performance among moderate-income borrowers was close to the aggregate performance in both 2005 and 2006.

Century Bank's overall geographic distribution of both small business and home mortgage loans demonstrates an excellent dispersion to both small businesses and borrowers within the low- and moderate-income census tracts.

The Bank originated 2.6 percent of home mortgage loans in low-income areas in 2005-2006. This is lower than the aggregate 3.0 percent in 2005 and 4.4 percent in 2006, but exceeds the percentage of owner-occupied

housing units (1.9 percent). The Bank's combined 2005 and 2006 lending in moderate-income tracts (33.3 percent) exceeded the aggregate in both years and reflects a very good penetration within the moderate-income census tracts.

In 2007, the Bank made approximately 2.0 percent of total assessment-area loans within low-income tracts, and 28.0 percent within moderate-income tracts. These numbers are comparable to the Bank's total 2005 and 2006 performance.

Leadership in Community-Development Loans

Based on Century Bank's lending capacity and opportunities available within their assessment area and the broader region, the Bank has made an adequate level of community development loans.

During the evaluation period, the Bank originated 13 community development loans totaling \$19.6 million. Although this dollar volume is less than in the 2005 examination, the decline is somewhat mitigated due to variable lending opportunities and a slightly smaller asset size. The total loan amount is still reflective of the Bank's willingness to extend credit to local businesses and organizations with a primary purpose of community development.

Innovative or Flexible Lending Practices

In order to serve the assessment area credit needs, the Bank makes good use of innovative and/or flexible lending practices. Century Bank offers various credit products with flexible criteria and underwriting guidelines to help meet the credit need of small businesses and low- and moderate-income individuals. The Bank's level of lending under these programs is considered good, and of particular note is its success at helping small businesses through its SBA lending. Century Bank ranked 6th out of all of the Massachusetts SBA 7(A) Guaranty Lenders in 2007, behind institutions of much larger asset size, i.e. RBS Citizens Bank, Bank of America, Sovereign Bank, Capital One and TD Banknorth.

On the residential side, Century Bank offers an in-house first time homebuyers (FTHB) program that offers flexible underwriting criteria and reduced closing costs to first time homebuyers.

⁸⁴ Based on most recent CRA Performance Evaluation by FDIC published 2007.

⁸⁵ Ibid.

⁸⁶ Ibid.



During the period under review the Bank made 38 FTHB loans totaling \$10.2 million.

Investment Test

Investment Test Rating: **LOW SATISFACTORY**⁸⁷

The institution has an adequate level of qualified community development investments and grants, and is occasionally in a leadership position.

Since the 2005 CRA evaluation, the Bank made approximately \$184,751 in qualified grant investments and approximately \$2.7 million in new qualified equity investments that benefited the Bank's assessment area or a broader statewide or regional area that included the Bank's assessment area. In addition, the Bank maintains \$3.7 million in existing qualified equity investments.

Currently, given the size of the institution, the degree of innovativeness and level of complexity displayed by the Bank, performance under the Investment Test is good. Further, the level of qualified donations has remained relatively constant.

Service Test

Service Test Rating: **HIGH SATISFACTORY**⁸⁸

Century Bank is doing a relatively high-level job of meeting both the retail banking and community development service needs of the assessment area.

Description of Service-Delivery Systems

The Bank's branches, some with 24-hour drive up ATM locations, are located throughout the assessment area and are easily accessible and convenient. The services and products offered are comparable to local or similarly sized competitors.

In 2006, the bank closed two branch offices in Boston: one at 280 Atlantic Avenue, and the other at 771 Commonwealth Avenue. During

the fourth quarter of 2007, the Company sold the assets associated with the Sherman Union branch on Commonwealth Avenue in Boston, as well as Automated Teller Machines (ATMs) located at or near Boston University.⁸⁹ The branch activities did not significantly change the income census tract composition of the branch network.⁹⁰

Community Development Services

The institution provides a relatively high level of community development services. In meeting community development service needs, several Bank officers are actively involved with local area community organizations.

The Bank's financial literacy initiatives include:

- **First Time Home Buyer Sessions** - Since the previous evaluation, the Bank has participated in several FTHB seminars. Representatives from the Bank's consumer loan department answer questions and accept applications from attendees.
- **Money Smart** - An adult education program developed by the FDIC to allow financial institutions the opportunity to provide outreach and financial literacy to adults outside of the financial mainstream. The Bank is an active participant in this program.

Members of Century Bank management are involved in several community development organizations throughout the assessment area. Management and staff were involved with the following organizations:

- A Better Chance, Masconomet, Inc.
- Catholic Charities
- Dimock Community Health Center
- Housing Families, Inc.
- Massachusetts Business Development Corporation
- North Shore Elder Services
- Visiting Nurses Association of Eastern Massachusetts (VNA)

⁸⁷ Based on most recent CRA Performance Evaluation by FDIC published 2007.

⁸⁸ Ibid.

⁸⁹ Century Bank Annual Report 2007

⁹⁰ Based on most recent CRA Performance Evaluation by FDIC, published 2007.



Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
512 Commonwealth Ave. Boston, MA 02215	✓	✓
710 Albany Street Boston, MA 02118	✓	✓
275 Hanover Street Boston, MA 02113	✓	✓
24 Federal Street Boston, MA 02110	✓	✓
136 State Street Boston, MA 02110	✓	✓
100 East Newton Street Boston, MA 02118	✓	
715 Albany Street Boston, MA 02118	✓	
710 Albany Street Boston, MA 02118	✓	
500 Commonwealth Ave. Boston, MA 02215	✓	

FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Century Bank's HMDA lending has been declining sharply since 2005. In 2005, HMDA applications received fell by 46%, and loans originated fell by 54%. The bank's HMDA applications and originations continued to fall in 2006, with originations dropping to 36% of 2004 levels. In 2007, they dropped a further 50%⁹¹

	2005	2006	2007
HMDA Applications Received	19	13	10
HMDA Loans Originated	13	10	5
Low-Income Applications Received	1	0	1
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			
	2005	2006	2007
Low	0.8%	0.8%	0.5%
Moderate	0.8%	0.5%	0.4%
Middle	0.7%	0.3%	0.2%
Upper	0.8%	0.3%	0.3%
Total	0.8%	0.4%	0.3%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2005	2006	2007
Low	1.8%	6.9%	3.6%
Moderate	2.9%	5.4%	4.7%
Middle	2.4%	2.2%	2.0%
Upper	3.1%	4.3%	1.7%
Total	2.6%	4.2%	2.8%

⁹¹ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.



Please refer to the addendum The 2007 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 2007 is also compared to the 2007 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 2007 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 The 2007 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, November 21, 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Century Bank 2007 Annual Report.

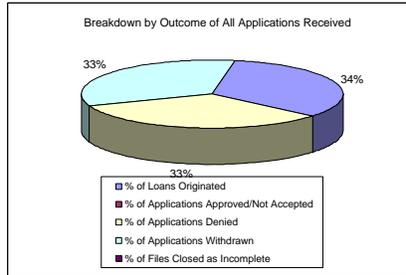
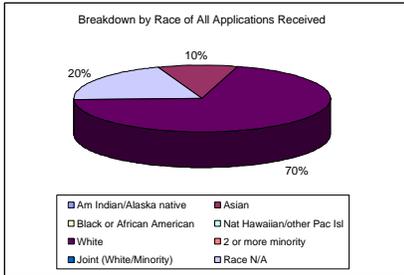
Century Bank website:
<http://www.century-bank.com/>

Century Bank HMDA Mortgage Information

2007

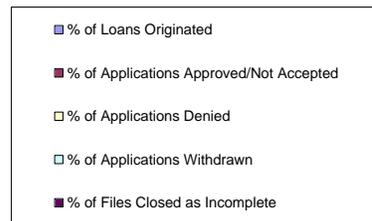
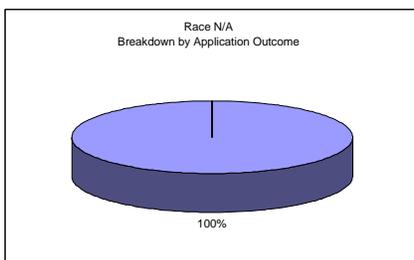
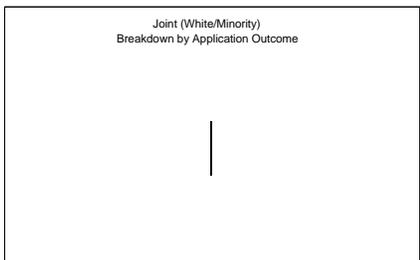
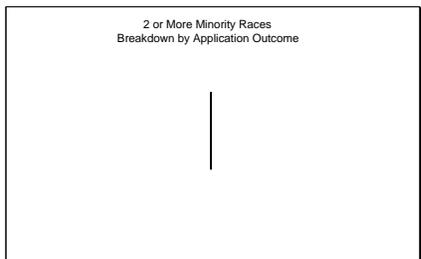
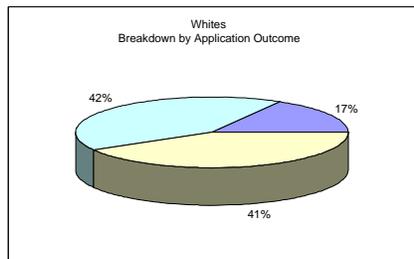
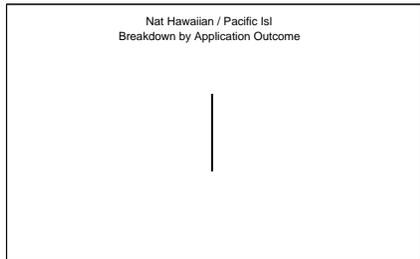
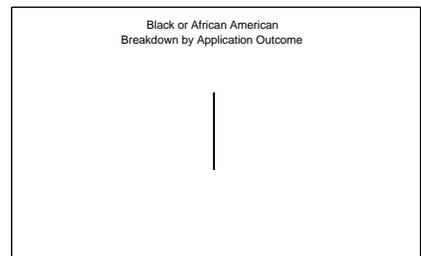
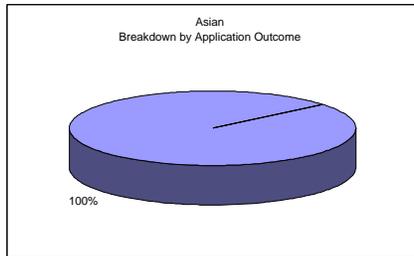
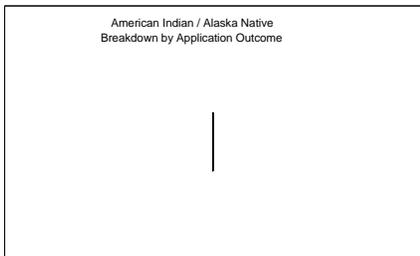
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	1	10%	1	20%	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	70%	2	40%	0	0%	4	100%	1	100%	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	20%	2	40%	0	0%	0	0%	0	0%	0	0%
Total	10	100%	5	100%	0	0%	4	100%	1	100%	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.



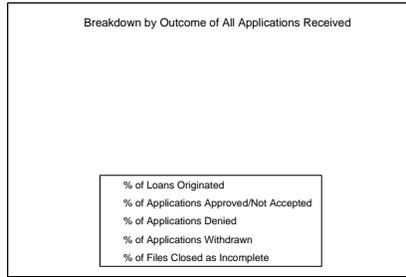
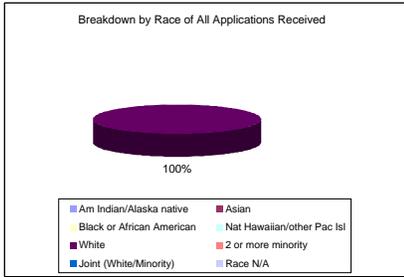
Century Bank Low-Income Mortgage Information

Note: No Data Reported For "Less Than 50% OF MSA/MD Median"

2007

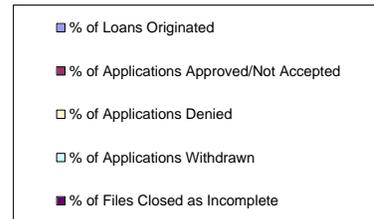
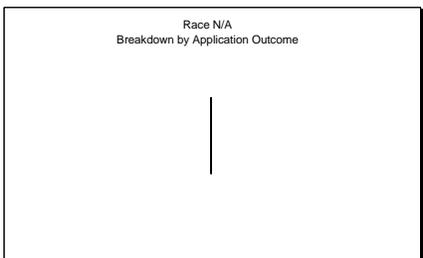
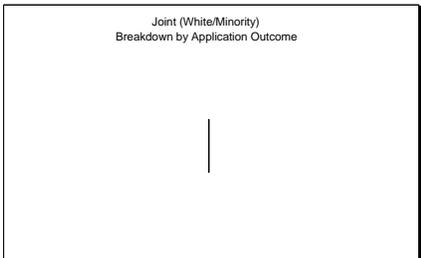
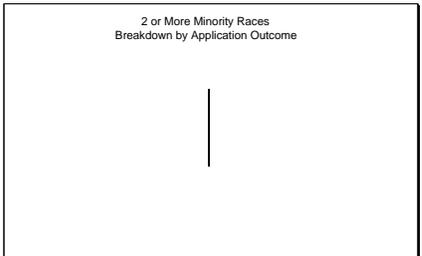
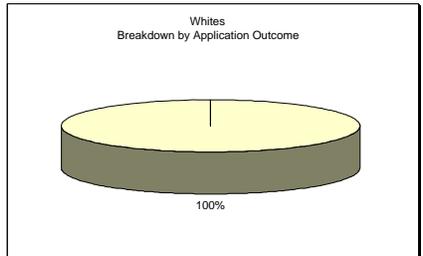
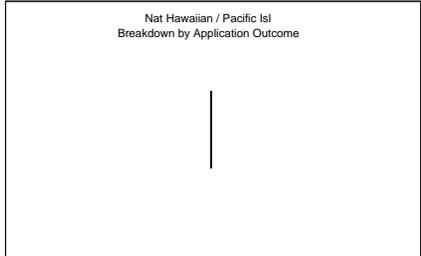
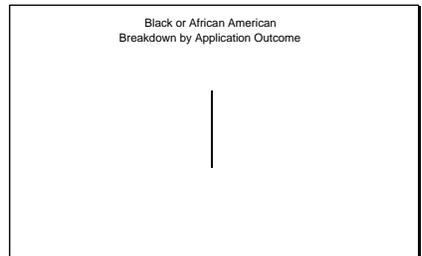
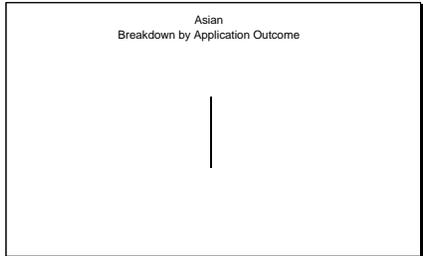
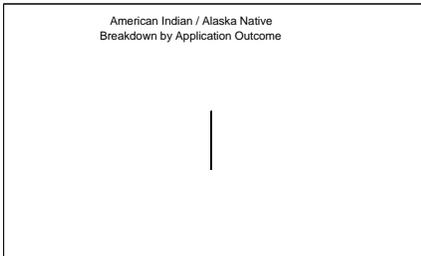
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of 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.



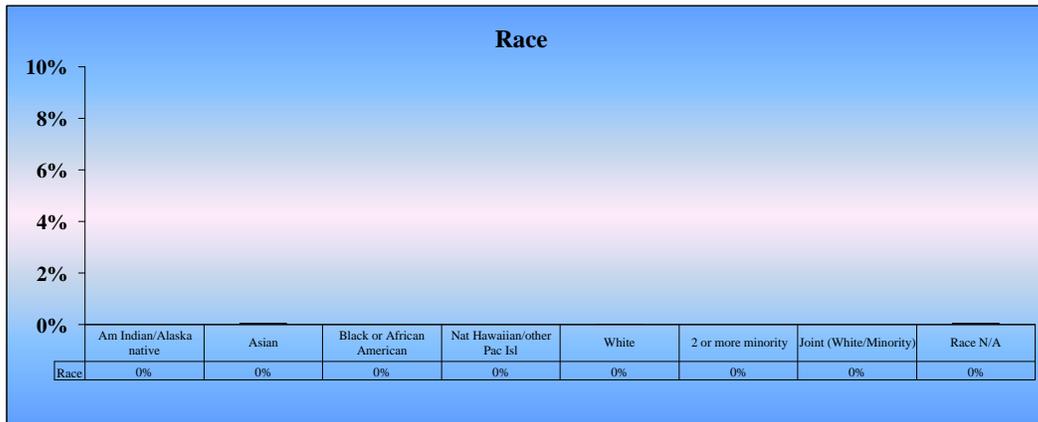
Compared against the MSA Aggregate Total

2007

Century Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	1	0%	1	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	0%	2	0%	0	0%	4	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	2	0%	2	0%	0	0%	0	0%	0	0%	0	0%
Total	10	0%	5	0%	0	0%	4	0%	1	0%	0	0%

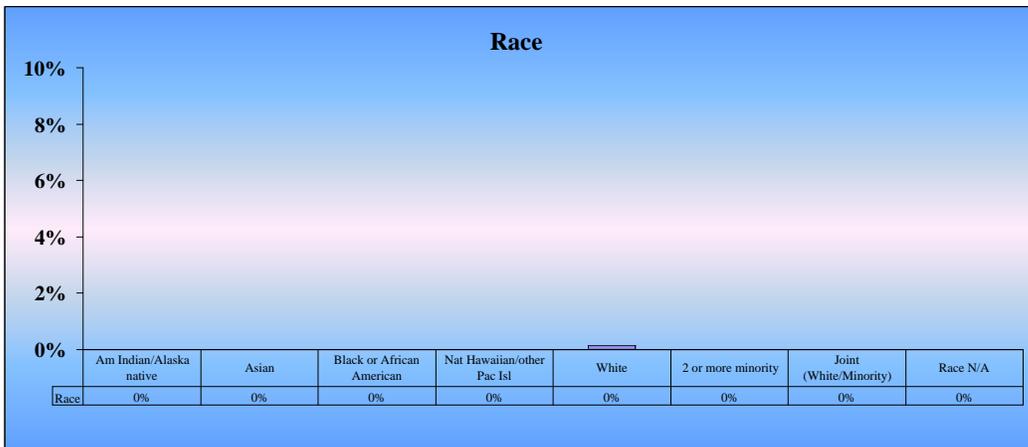
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Century Bank Low-Income Mortgage Information

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

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





Employment Information





RBS Citizens Bank



Compliance Officer, Citizens Financial Group

Thomas Metzger
One Citizens Plaza
Providence, RI 02903
(401) 456-7096

RBS Citizens Bank Overview

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

Description

Citizens Financial Group, Inc. is a \$161 billion commercial bank holding company headquartered in Providence, RI. It is the 8th largest bank in the nation, with more than 1620 branches, 3500 ATMs, and 25,000 employees in 13 states. RBS Citizens is wholly owned by The Royal Bank of Scotland Group plc. Information from the 2002 CRA report references the Citizens Bank of Massachusetts.

The bank's Massachusetts division's primary market focus is on providing credit, deposit accounts, and services to individuals and small businesses. The bank has 258 branch offices and 617 ATMs in Massachusetts.

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

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

Principal Officers

CEO, Citizens Financial Group

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

President, Citizens Financial Group

James G. Connolly
One Citizens Plaza
Providence, RI 02903
(401) 456-7096

Employees

Number of Employees	25,000
Number of Employees in Massachusetts	3119 ⁹²
Percentage of Women Employees	65%
Percentage of Minority Employees	28%

Branches

Number of Branches - Total	258
Branches in Boston PSMA	35
Number of ATMs	617
Number of Free-Standing ATMs	359

CRA Rating

Rating Agency	OCC
Most Recent Rating	2007
Overall Rating	OUTSTANDING ⁹³
Lending Test Rating	OUTSTANDING
Investment Test Rating	OUTSTANDING
Service Test Rating	OUTSTANDING

⁹² FDIC Institution Directory.

⁹³ Based on most recent CRA Performance Evaluation by OCC published 2007.



Discussion

Overall rating: OUTSTANDING⁹⁴

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

Lending Test

**Lending Test Rating:
OUTSTANDING⁹⁵**

General Responsiveness to Credit Needs

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

Responsiveness to Low- and Moderate-Income Credit Needs

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

The geographic distribution of home mortgage loans and small loans to businesses reflects good distribution of loans among geographies of different income levels.

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

Citizens offers excellent loan product flexibility, which has a positive impact on lending test performance. The bank offers several loan programs of its own targeted to low- and moderate-income borrowers, which showed excellent product flexibility.

⁹⁴ Based on most recent CRA Performance Evaluation by OCC published 2007.

⁹⁵ Based on most recent CRA Performance Evaluation by OCC published 2007.

Investment Test

**Investment Test Rating:
OUTSTANDING⁹⁶**

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

Citizens 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 assessment areas. The grants were associated with affordable housing, economic development, and community services for low- and moderate-income individuals.

Citizens Bank of Massachusetts was named Innovator of the Year in the large company category at the Boston Business Journal's Corporate Philanthropy Summit 2006. The summit was organized by The Boston Foundation, The Greater Boston Chamber of Commerce, and The United Way of Massachusetts Bay.⁹⁷

Service Test

Service Test Rating: OUTSTANDING⁹⁸

Description of Service-Delivery Systems

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

The bank offers a variety of alternative delivery systems, which include full service ATMs and telephone banking including loan-by-phone services. On-line banking services included deposit applications, retail loan applications, home equity and mortgage loan applications, small business and commercial loan applications and bill payment services. Citizens also offers

⁹⁶ Ibid.

⁹⁷ Citizens Bank press release, September 7, 2006.

⁹⁸Based on most recent CRA Performance Evaluation by OCC published 2007.



an affordable checking account product that would be attractive to low- and moderate-income people.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
One Financial Center Boston, MA 02111	✓	✓
1 Center Plaza Boston, MA 02108-1888	✓	✓
1100 Massachusetts Ave. Dorchester, MA 02125	✓	✓
1355 Washington Street Boston, MA 02118-2140	✓	✓
1377 Hyde Park Ave Hyde Park, MA 02136	✓	✓
152 Everett Avenue Chelsea, MA 02150-1839	✓	✓
1575 Blue Hill Avenue Mattapan, MA 02126-2122	✓	✓
1628 Tremont Street Boston, MA 02120	✓	✓
1999 Centre Street West Roxbury, MA 02132	✓	✓
217 Adams Street Dorchester, MA 02122-1300	✓	✓
2343 Washington Street Roxbury, MA 02119-3216	✓	✓
26 Central Square East Boston, MA 02128-1911	✓	✓
28 State Street Boston, MA 02109	✓	✓
315 Hanover Street Boston, MA 02113-1895	✓	✓
40 Summer Street Boston, MA 02110	✓	✓
426 Boylston Street Boston, MA 02116-3864	✓	✓
435 Brookline Avenue Boston, MA 02215-5400	✓	✓
441 West Broadway South Boston, MA 02127	✓	✓
5 Austin Street Charlestown, MA 02129-3501	✓	✓
53 State Street Boston, MA 02109	✓	✓
535 Boylston Street Boston, MA 02116	✓	✓
560 Commonwealth Avenue Boston, MA 02215	✓	✓
569-571 Washington Street Dorchester, MA 02124	✓	✓
572 Columbia Road	✓	✓

Dorchester, MA 02125-2348		
6 Avenue de Lafayette Boston, MA 02111	✓	✓
60 Everett St. Allston, MA 02134	✓	✓
60 Newmarket Square Boston, MA 02118	✓	✓
607 Boylston Street Boston, MA 02116	✓	✓
673 VFW Parkway West Roxbury, MA 02167	✓	✓
696 Centre Street Jamaica Plain, MA 02130-2594	✓	✓
73 Tremont Street Boston, MA 02108-3901	✓	✓
731 Morrissey Boulevard Dorchester, MA 02122-3405	✓	✓
77 Franklin Street Boston, MA 02110	✓	✓
771 Commonwealth Avenue Boston, MA 02215	✓	✓
777 South Street Roslindale, MA 02131-1796	✓	✓
1 Boston Place Boston, MA 02108	✓	
1 Deaconess Way Boston, MA 02115	✓	
1 Milk Street Boston, MA 02109	✓	
100 City Hall Plaza Boston, MA 02108	✓	
101 Huntington Avenue 17th Floor Boston, MA 02199	✓	
1025 Truman Highway Hyde Park, MA 02136	✓	
1079 Commonwealth Avenue Boston, MA 02134	✓	
111 Huntington Avenue Boston, MA 02199	✓	
1187 Hyde Park Road Hyde Park, MA 02136	✓	
122-128 Cambridge Street Boston, MA 02114	✓	
141 Massachusetts Avenue Boston, MA 02115	✓	
1420 Dorchester Avenue Dorchester, MA 02122	✓	
145 Dartmouth Street Boston, MA 02116	✓	
160 Federal Street Boston, MA 02110	✓	
1620 Tremont Street Boston, MA 02120	✓	
1710 Centre Street West Roxbury, MA 02132	✓	



177 State Street ✓
 Boston, MA 02019
 1886 Dorchester Avenue ✓
 Dorchester, MA 02122
 2 DeLafayette Avenue, ✓
 Boston, MA 02111
 200 Clarendon Street ✓
 Concourse
 Boston, MA 02117
 200 Mount Vernon Street ✓
 Dorchester, MA 02125
 205 Maverick Street ✓
 East Boston, MA 02128
 225 Franklin Street ✓
 Boston, MA 02110
 250 Cambridge Street ✓
 Boston, MA 02114
 250 New Rutherford ✓
 Boston, MA 02129
 301 Centre Street ✓
 Jamaica Plain, MA 02130
 33 Kilmarnock Street ✓
 Boston, MA 02215
 342 Hanover Street ✓
 Boston, MA 02113
 405 W. Broadway ✓
 South Boston, MA 02127
 660 Beacon Street ✓
 Boston, MA 02215
 684 Centre Street ✓
 Jamaica Plain, MA 02130
 700 Atlantic Avenue ✓
 Boston, MA 02111
 713 East Broadway ✓
 South Boston, MA 02127
 75 Spring Street ✓
 West Roxbury, MA 02132
 750 Washington Street ✓
 Boston, MA 02111
 8 Washington Street ✓
 Chelsea, MA 02150
 800 Boylston Street ✓
 Boston, MA 02199
 840 Harrison Avenue ✓
 Roxbury, MA 02119
 863 Columbia Road ✓
 Dorchester, MA 02125
 900 Boylston Street ✓
 Boston, MA 02115
 92 State Street ✓
 Boston, MA 02109
 950 American Legion Highway ✓
 Roslindale, MA 02131
 Logan Airport B4 ✓
 1 Harborside Drive,
 East Boston, MA 02128

Logan Airport C6 ✓
 1 Harborside Drive
 East Boston, MA 02128
 Logan Airport E5 ✓
 1 Harborside Drive - Logan
 Airport
 East Boston, MA 02128
 Logan Terminal A5 ✓
 1 Harborside Drive
 East Boston, MA 02128
 Science Park ✓
 Boston, MA 02114

FSB: Full Service Branch

Special Programs

Citizens Bank is involved in the following Community-Development Services within Greater Boston:⁹⁹

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

In summer 2004, the bank began the Citizens Housing Bank to provide low-interest loan funds to non-profit developers to create more affordable housing units in New England.¹⁰⁰ In 2006, the Housing Bank and Charter One Housing Bank community development loan programs offered \$82 million in low-interest loans to non-profit housing developers to create 1,071 affordable-housing units.¹⁰¹

The bank’s Community Champions program assists small, non-profit agencies in New England and Pennsylvania dedicated to significant social service issues. Each champion receives a \$25,000 grant, volunteer support from Citizens colleagues and vendors, and extensive media exposure. Since introducing the program in 2002, Citizens has awarded 21 Massachusetts organizations \$525,000.¹⁰²

Additional Information

Citizens Bank was named the Small Business Association’s “New England Regional Lender of

⁹⁹ Based on the 2002 CRA Performance evaluation by FDIC.

¹⁰⁰ RBS Citizens website

¹⁰¹ Citizens Financial Group Annual Report, 2007

¹⁰² Ibid.



the Year” for 2007, as well as the SBA’s #1 lender in Massachusetts. This was the ninth year that Citizens Financial Group was the #1 originator of SBA loans in New England.¹⁰³

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Citizens Bank’s HMDA lending decreased in every category in 2005; most notably, low-income applications fell by almost half. These declines were reversed in 2006, with HMDA lending jumping 58%.

In 2007, Citizens’ HMDA lending more than tripled, and its low-income HMDA lending increased more than eight-fold, from 4 loans to 34 loans.¹⁰⁴

	2005	2006	2007
HMDA Applications Received	156	210	620
HMDA Loans Originated	77	121	398
Low-Income Applications Received	12	12	56
Low-Income Loans Originated	2	4	34

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			
	2005	2006	2007
Low	14.1%	7.1%	5.6%
Moderate	10.5%	5.4%	4.4%
Middle	11.0%	2.7%	2.2%
Upper	11.9%	4.6%	3.4%
Total	11.6%	4.4%	3.5%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2005	2006	2007
Low	30.7%	39.3%	35.2%
Moderate	25.3%	22.9%	17.2%
Middle	26.4%	12.5%	11.6%
Upper	25.2%	29.9%	18.2%
Total	26.7%	23.6%	18.3%

Please refer to the addendum [The 2007 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 2007 is also compared to the 2007 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 2007 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 [The 2007 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

¹⁰³ RBS Citizens website

¹⁰⁴ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.



Source Documents

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

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; December 2, 2002.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Citizens Financial Group Annual Report 2007.

RBS Citizens website:

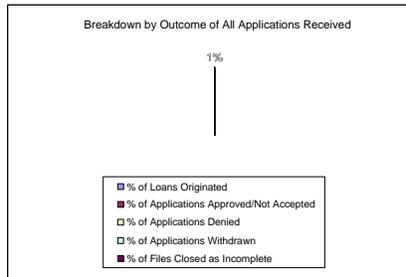
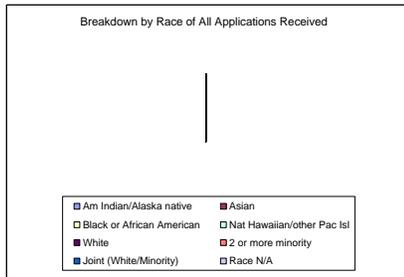
<http://www.citizensbank.com/>

Citizens Bank HMDA Mortgage Information

2007

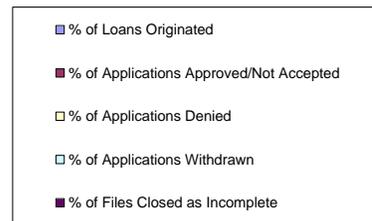
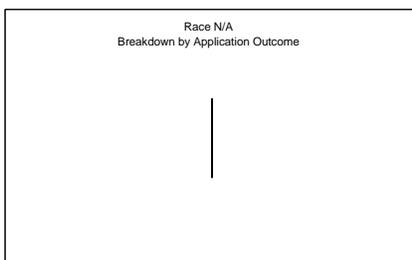
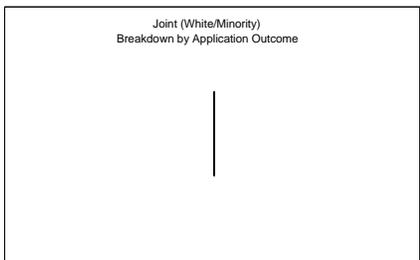
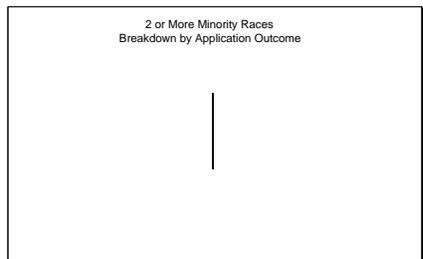
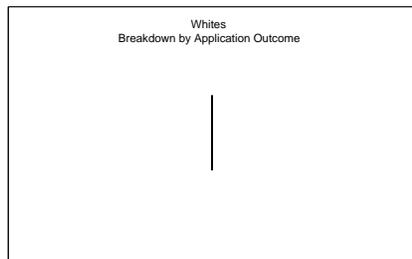
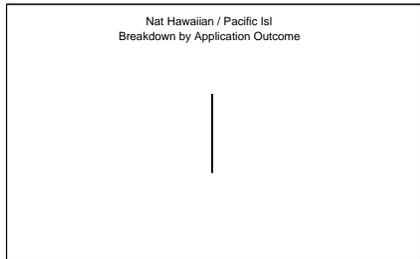
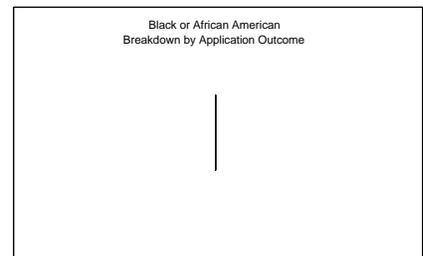
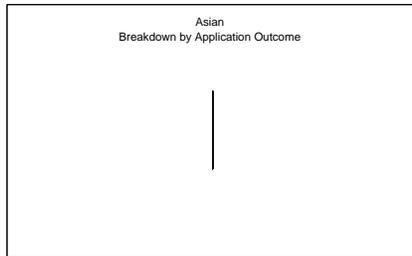
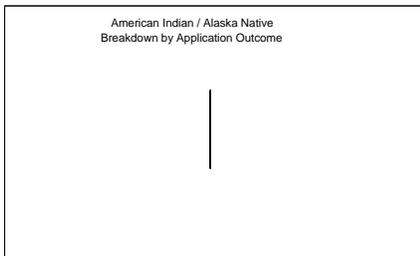
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of 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.

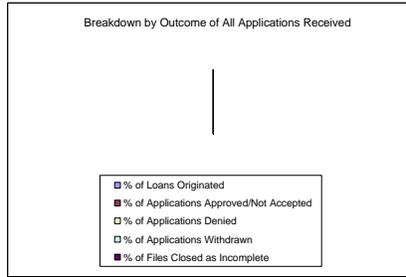
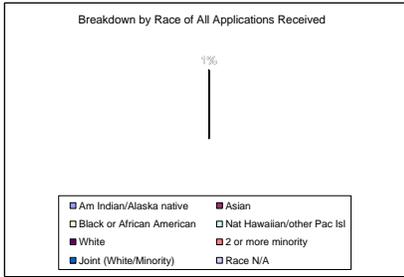


Citizens Bank Low-Income Mortgage Information

2007

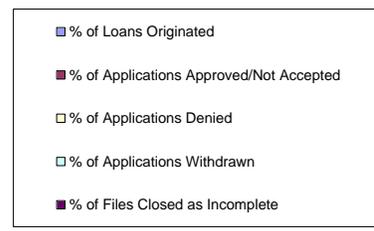
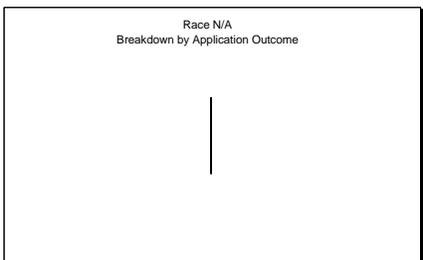
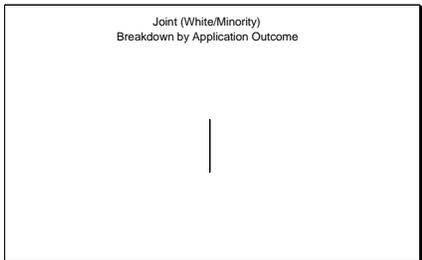
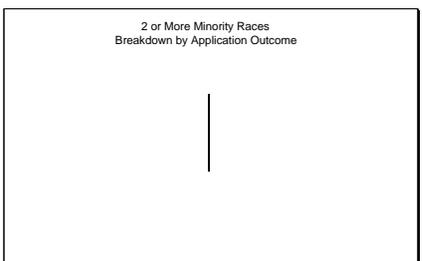
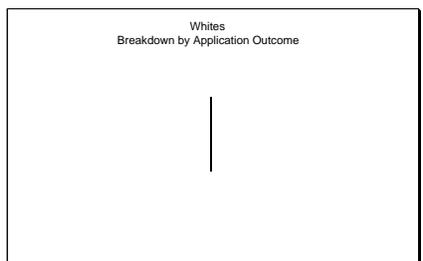
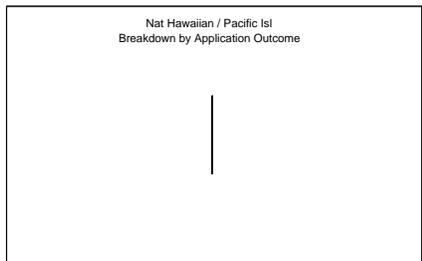
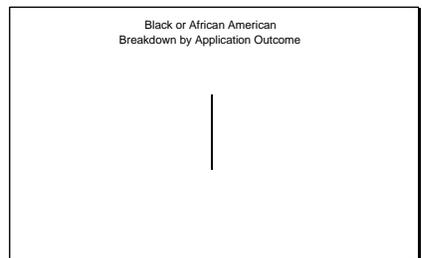
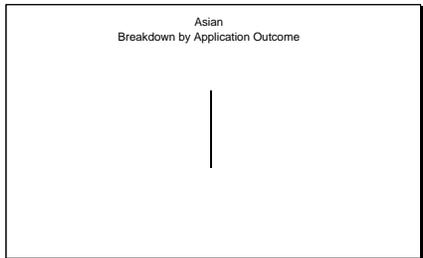
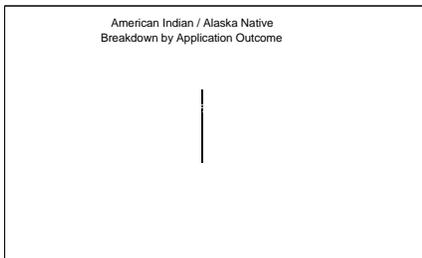
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of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

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



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

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





Employment Information





East Boston Savings Bank



East Boston Savings Bank Overview

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

Description

East Boston Savings Bank (EBSB) is an \$988.4 million community bank with its main office in East Boston. EBSB is a subsidiary of Meridian Financial Services, Inc., a bank holding company.

The bank's primary focus is the origination of residential mortgage loans. Residential mortgages constitute 50.8 percent of the institution's loan portfolio. The institution's balance sheet is primarily weighted within the loan portfolio, as total loans represent 57.0 percent of total assets.

In November 2007, EBSB announced a partial mutual-to-stock conversion. It anticipated selling 44 percent of the banks shares, and raising between \$80 and \$130 million, of which \$3 million will be donated to the bank's Meridian Charitable Foundation.

Principal Officers

Chairman, CEO, & Acting President

Mr. Richard J. Gavegnano
 10 Meridian Street
 East Boston, MA 02128
 978-977-3272

CFO

Leonard V. Siuda
 10 Meridian Street
 East Boston, MA 02128
 978-977-3272

EVP Compliance Officer

Philip F. Freehan
 10 Meridian Street
 East Boston, MA 02128
 978-977-3272

Employees

Number of Employees	224 ¹⁰⁵
Number of Employees in Massachusetts	224
Percentage of Women Employees	79%
Percentage of Minority Employees	18%

Branches

Number of Branches - Total	12
Branches Within Boston PSMA	3
Number of ATMs	12
Number of Free-Standing ATMs	0

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2005
Overall Rating	OUTSTANDING¹⁰⁶
Lending Test Rating	OUTSTANDING
Investment Test Rating	LOW
Service Test Rating	SATISFACTORY
	OUTSTANDING

¹⁰⁵ Institution Directory Demographic Summary, FDIC; December 31, 2007.

¹⁰⁶ Based on most recent CRA Performance Evaluation by FDIC published 2005.



Discussion

Overall rating: OUTSTANDING¹⁰⁷

Lending Test

Lending Test Rating: OUTSTANDING¹⁰⁸

EBSB's lending activity within its designated assessment area is reflective of a good level of responsiveness to the credit needs of the area.

EBSB's overall distribution of loans demonstrates an excellent record of lending to individuals and businesses of varying income levels. EBSB demonstrates an excellent performance of lending to borrowers within low- and moderate-income geographies.

Responsiveness to Low- and Moderate-Income Credit Needs

EBSB's record of residential mortgage lending reflects an excellent dispersion to borrowers of varying income levels, particularly low- and moderate-income individuals. EBSB granted 17.2% of residential mortgage loans to low-income borrowers in 2003, and 14.6% in 2002, significantly outperforming the aggregate market's 8.7 percent.

EBSB makes good use of innovative and flexible lending programs within its designated assessment area. Demonstrating EBSB's commitment to these innovative and flexible products is the generally increasing trend in originating loans through these programs. In 2002 EBSB originated approximately \$6.4 million of innovative and flexible loan products, whereas the dollar volume through the third quarter of 2005 was approximately \$10.9 million.

Leadership in Community-Development Loans

EBSB's current performance in community development lending is considered good. A review of the current FDIC evaluation period identified thirteen community development loans totaling \$5,970,000.

¹⁰⁷ Based on most recent CRA Performance Evaluation by FDIC published 2005.

¹⁰⁸ Ibid.

The bank's 2005 CDLs include:

- A \$575,000 loan to finance the acquisition of a commercial real estate property.
- An annual renewal of a \$50,000 unsecured line of credit to a local non-profit community development organization.
- Two \$20,000 short-term time notes to a non-profit, private preparatory school in East Boston.

Investment Test

Investment Test Rating: LOW SATISFACTORY¹⁰⁹

The bank's securities portfolio, as of September 30, 2005, totaled \$256,014,000. Of the total securities, \$990,900 is considered a qualified investment, which represents only 0.38% of the securities portfolio.

In June, 2005, the bank invested \$988,760 in Single Family Housing Notes issued by the Massachusetts State Housing Finance Agency. The program assists low- and moderate-income individuals and families.

The bank and its charitable foundation, the Meridian Charitable Foundation, have made qualified donations during the assessment period, totaling: \$39,775 in 2002, \$45,650 in 2003, \$61,275 in 2004, and \$68,450 in 2005. This represents an average annual dollar increase in qualified donations of 20.2 percent.

In 2006, the total grants issued by the Foundation dropped to \$47,157,¹¹⁰ though in 2008 they rose to \$185,000 on the heels of a \$3 million donation to the foundation as a result of the bank's partial mutual-to-stock conversion.¹¹¹

EBSB's performance under the Investment Test is "Low Satisfactory." The primary factor for this rating is the inconsistent level at which the

¹⁰⁹ Based on most recent CRA Performance Evaluation by FDIC published 2005.

¹¹⁰ "East Boston Savings Bank's Meridian Charitable Foundation awards \$47,000 in grants to 12 community organizations," EBSB website.

¹¹¹ "Meridian Charitable Foundation awards an additional \$113,725 in grants to 29 community organizations," EBSB website.



bank has maintained qualified equity investments throughout the evaluation period.¹¹²

Service Test

Service Test Rating: OUTSTANDING¹¹³

Description of Service-Delivery Systems

EBSB’s services are readily accessible to the entire population of the assessment area, including low- and moderate-income individuals.

Of the bank’s branch locations, three are located in moderate-income census tracts, and six are located in middle-income census tracts. EBSB also operates a loan production center located in an upper-income census tract of Lynnfield. The bank has implemented adequate procedures for opening and closing branch offices.

EBSB is a member of the SUM Program, an alliance of banks and credit unions that have joined to provide customers with surcharge-free ATM access. Telephone and online banking services are also available.

The institution’s branch locations, services, and business hours are tailored to the convenience and needs of its designated assessment area, including low- and moderate-income geographies and individuals.

Community Development Services

EBSB offers a wide range of community development services and retail products that benefit people of all income levels, with many directly serving the needs of low- and moderate-income customers. The degree to which bank employees are involved in community development programs and projects is considered excellent.

EBSB’s performance under the Service Test is considered “Outstanding” primarily due to the bank’s proactive approach to becoming involved with organizations and events that address many community development needs within the designated assessment area. Particularly representative of this approach is the leadership

role assumed by the bank in introducing the Money Smart program to its assessment area, which meets a primary community development need.

Branch Information:

Branch locations in the Boston MSA:

Location	ATM	FSB
Ten Meridian Street East Boston, MA 02128	✓	✓
One Bennington Street East Boston, MA 02128	✓	✓
856 Bennington Street East Boston, MA 02128	✓	✓

FSB: Full Service Branch

¹¹² Based on most recent CRA Performance Evaluation by FDIC published 2005.

¹¹³ Ibid.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

East Boston Savings Bank's HMDA lending increased in 2005: applications by 37% and originations by 33%.

In 2006, both HMDA applications and HMDA originations fell by nearly 50%; the bank's low-income HMDA lending held steady.¹¹⁴ In 2007, the bank's lending was consistent with 2006 levels.

	2005	2006	2007
HMDA Applications Received	92	47	47
HMDA Loans Originated	56	29	40
Low-Income Applications Received	8	9	3
Low-Income Loans Originated	5	5	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			
	2005	2006	2007
Low	0.1%	0.0%	0.1%
Moderate	0.2%	0.2%	0.0%
Middle	0.1%	0.0%	0.0%
Upper	0.0%	0.0%	0.0%
Total	0.1%	0.1%	0.0%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2005	2006	2007
Low	0.3%	0.8%	1.7%
Moderate	2.6%	4.1%	0.4%
Middle	0.5%	0.0%	0.3%
Upper	0.0%	0.0%	0.2%
Total	0.9%	1.1%	0.5%

Please refer to the addendum The 2007 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 2007 is also compared to the 2007 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 2007 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 The 2007 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

¹¹⁴ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; November 1, 2005.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Massachusetts Division of Banks, Summary Information for State Chartered Banks and Credit Unions:

<http://db.state.ma.us/dob/in-choose.asp>

FDIC Institution Directory:

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

East Boston Savings Bank website:

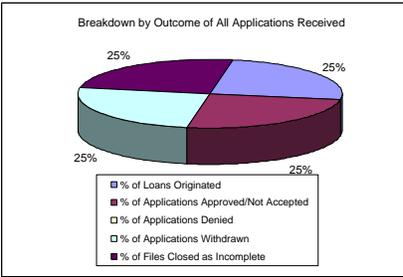
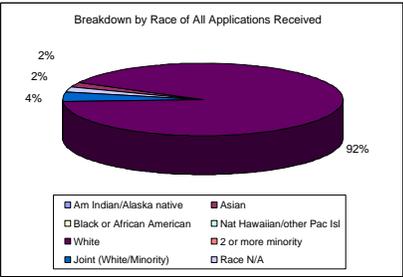
<http://www.ebsb.com/>

East Boston Savings Bank HMDA Mortgage Information

2007

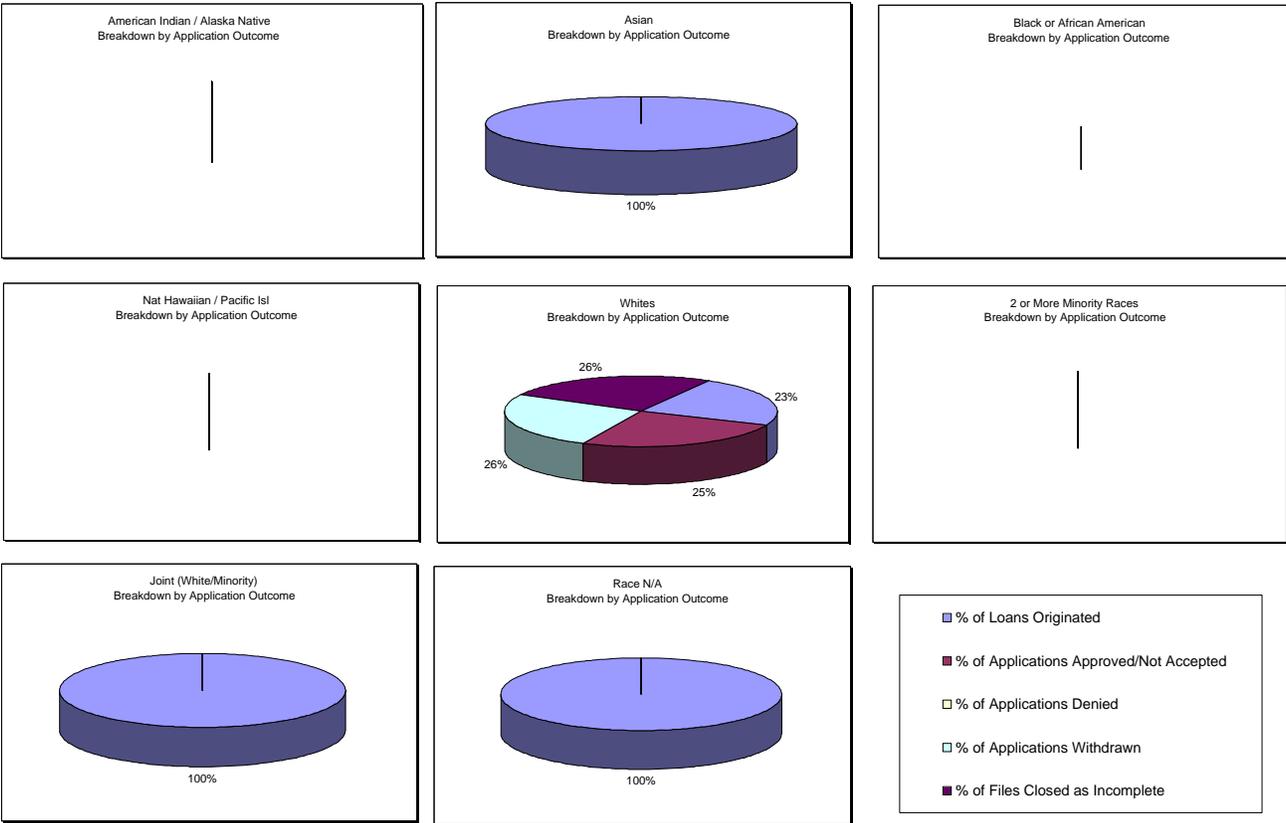
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	1	2%	1	3%	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	43	91%	36	90%	2	100%	0	0%	3	100%	2	100%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	4%	2	5%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	2%	1	3%	0	0%	0	0%	0	0%	0	0%
Total	47	100%	40	100%	2	100%	0	0%	3	100%	2	100%

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.

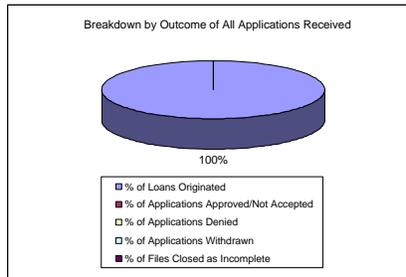
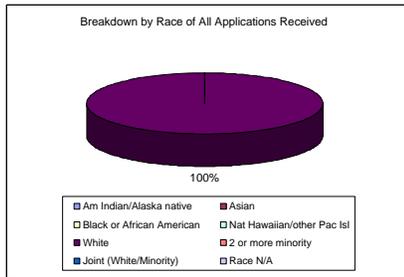


East Boston Savings Bank Low-Income Mortgage Information

2007

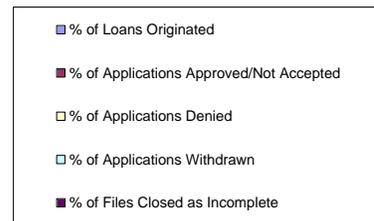
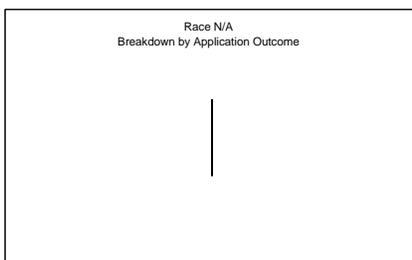
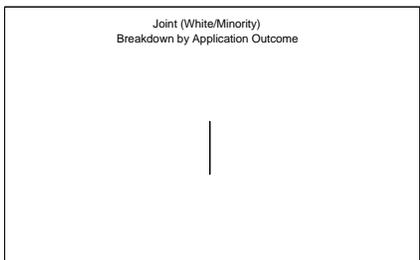
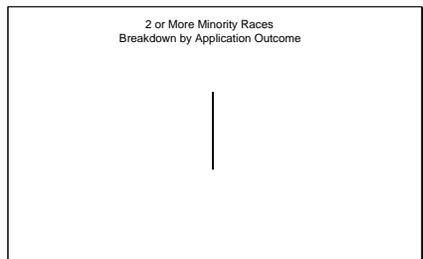
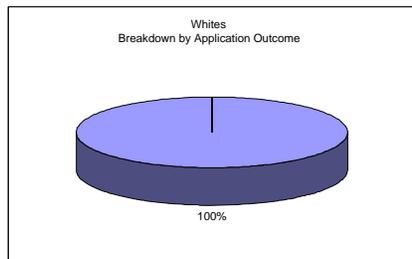
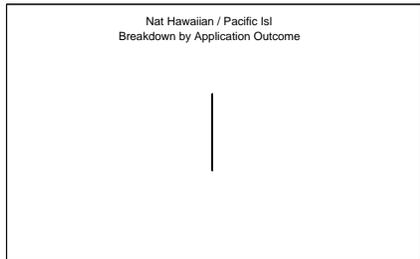
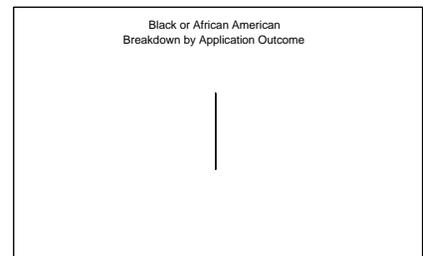
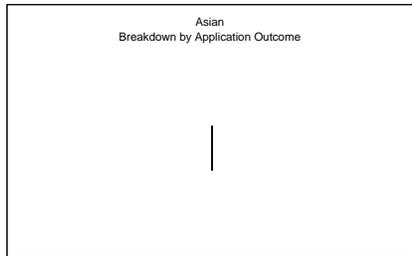
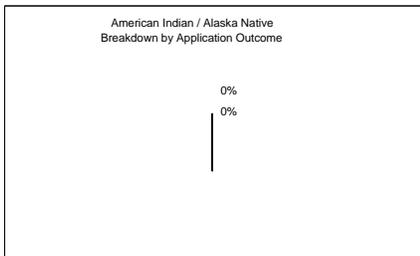
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of 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	3	100%	3	100%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	3	100%	3	100%	0	0%	0	0%	0	0%	0	0%

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



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

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



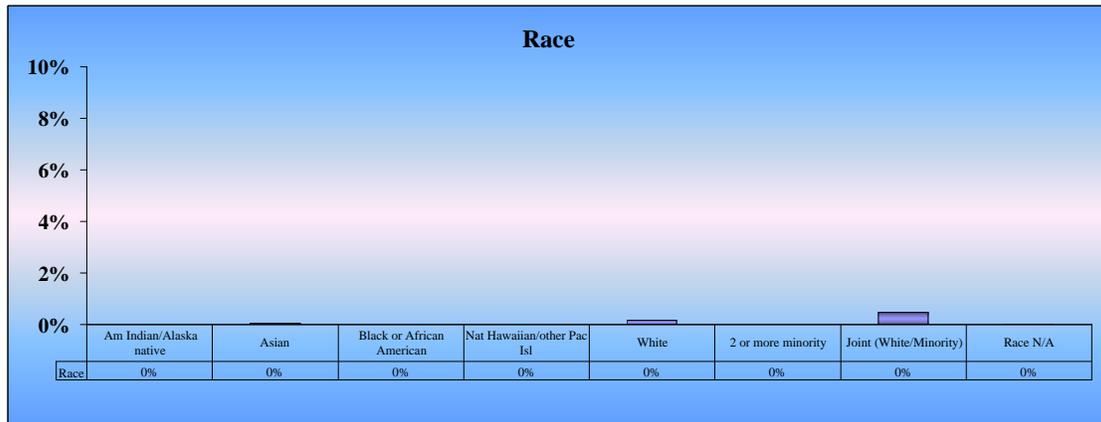
Compared against the MSA Aggregate Total

2007

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	1	0%	1	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	43	0%	36	0%	2	0%	0	0%	3	0%	2	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	0%	2	1%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	0%	1	0%	0	0%	0	0%	0	0%	0	0%
Total	47	0%	40	0%	2	0%	0	0%	3	0%	2	0%

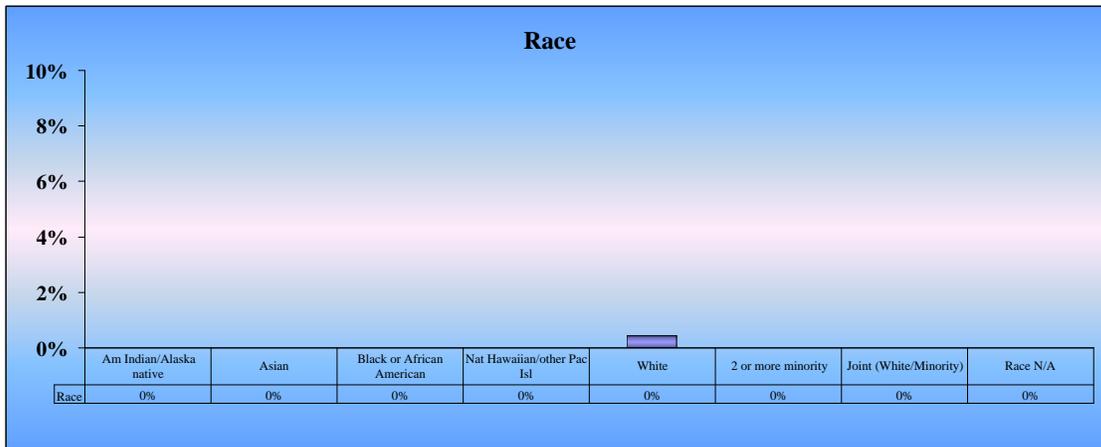
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



East Boston Savings Bank Low-Income Mortgage Information

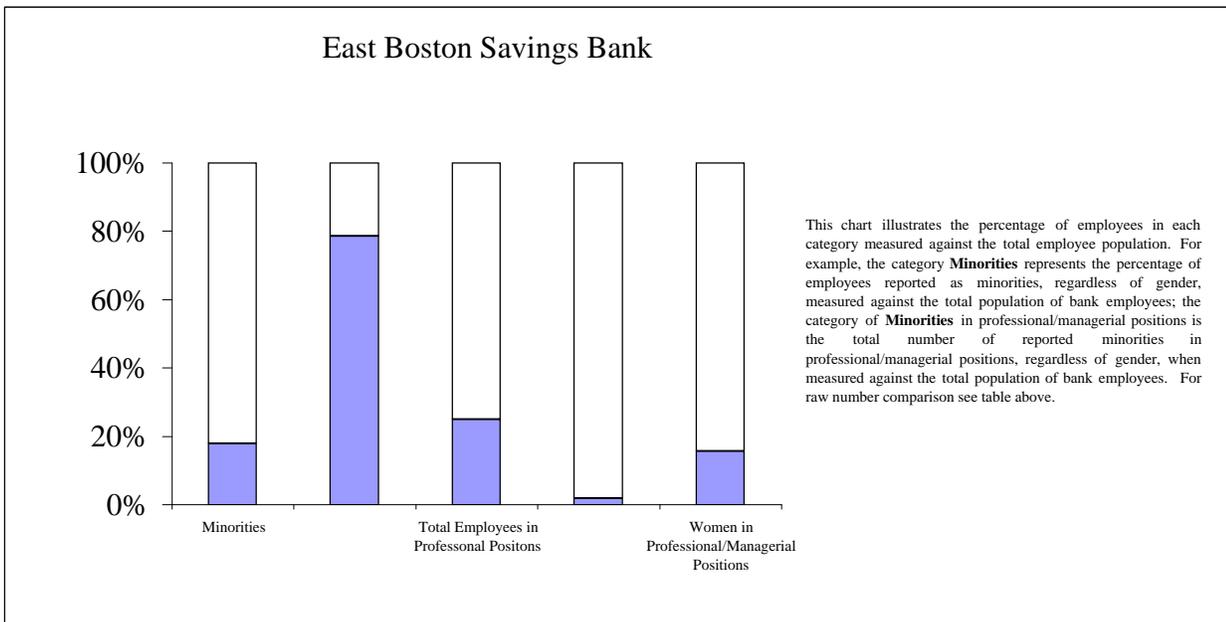
Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% 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	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	3	0%	3	1%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	3	0%	3	0%	0	0%	0	0%	0	0%	0	0%

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



East Boston Savings Bank Employment Information

	Number of Employees	Percent of Total Employees
Total	224	
Minorities	40	18%
Women	176	79%
Total Employees In Professional Positions	56	25%
Minorities in Professional or Managerial Positions	4	2%
Women in Professional or Managerial Positions	35	16%







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. With \$6.8 billion in assets, Eastern Bank is headquartered in Boston and maintains regional offices in Middleborough and Lynn.

Eastern Bank’s primary business focus is residential real-estate lending, commercial lending, commercial real-estate lending, and consumer lending.

Principal Officers

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

President
Robert F. Rivers
265 Franklin Street
Boston, MA 02110
617-897-1008

CFO
Charles M. Johnston
265 Franklin Street
Boston, MA 02110
617-897-1008

Chief Compliance Officer
Cynthia C. Merkle
265 Franklin Street
Boston, MA 02110
617-897-1008

Employees

Number of Employees	1700 ¹¹⁵
Number of Employees in Massachusetts	1700
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	73
Branches within Boston PSMA	4
Number of ATMs	82
Number of Free-Standing ATMs	9

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2007
Overall Rating	OUTSTANDING ¹¹⁶
Lending Test Rating	HIGH SATISFACTORY
Investment Test Rating	OUTSTANDING
Service Test Rating	OUTSTANDING

¹¹⁵ FDIC Institution Directory

¹¹⁶ Based on most recent CRA Performance Evaluation by FDIC published 2007.



Discussion

Overall rating: OUTSTANDING¹¹⁷

Lending Test

Lending Test Rating:
HIGH SATISFACTORY¹¹⁸

General Responsiveness to Credit Needs

Overall, Eastern Bank's home mortgage, small business, and indirect automobile lending activity reflects good responsiveness to assessment area credit needs considering the size of the institution, loan portfolio composition, and high level of competition within its designated assessment area. The bank's average net loan-to-deposit ratio over the previous twelve quarters is 92.3%, which is the highest when compared to the ratios of five similarly focused financial institutions.¹¹⁹

Responsiveness to Low- and Moderate-Income Credit Needs

The distribution of Eastern Bank's home mortgage and small business loans reflects good penetration among borrowers of different income levels and businesses of varying sizes.¹²⁰

The distribution of home mortgages by borrower income, compared to assessment area demographics and aggregate lending performance, demonstrates the bank's commitment to, and success in, extending credit to borrowers of all income levels, especially those of low and moderate income.

The distribution of home mortgages to borrowers of varying income levels, particularly those of low- and moderate-income, is excellent. The bank extended 9.5% by number and 4.9% by dollar volume of home mortgage loans to low-income borrowers. Although these figures are lower than the percentage of low-income families in the assessment area (20.2%), the bank's performance significantly exceeds the aggregate lending performance of 3.8%.

The institution extended 24% of home mortgage loans by number and 17.5% by dollar volume to moderate-income borrowers in 2005. This performance compares very favorably against both the percentage of moderate-income families in the assessment area at 17.5%, and the aggregate lending data at 15.4%.

The institution'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.

The institution extended 1.6% of home purchase loans in low-income census tracts, which compares favorably against the demographics (1.2%), but is less than the aggregate lending performance of 3.5%. Similarly, the bank made 19% of its home purchase loans in moderate-income census tracts, which compares favorably against the demographics (13%), but is less than the aggregate lending data at 21.6%.

Leadership in Community-Development Loans

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

Throughout the review period of April 21, 2004 through March 31, 2007, the institution extended 69 community development loans for a total amount of \$77,518,000. These loans have significantly impacted the communities in which they are targeted, and are responsive to assessment area credit needs. Overall, the bank's record of making community development loans is excellent.

Eastern Bank extended 10 community development loans totaling \$5,803,000 in the first quarter of 2007. In January 2007, the bank extended a \$270,000 loan to a non-profit agency for the acquisition and rehabilitation of a multi-family dwelling to provide permanent housing for homeless individuals. The property is

¹¹⁷ Based on most recent CRA Performance Evaluation by FDIC published 2007.

¹¹⁸ Ibid.

¹¹⁹ Ibid.

¹²⁰ Ibid.



located in a low-income census tract in the Dorchester neighborhood of Boston.

Innovative & Flexible Lending Practices

Eastern Bank makes extensive use of innovative and flexible lending programs. Several loan programs offered by the bank are specifically tailored to assist low- and moderate-income individuals in attaining homeownership by offering below-market interest rates with flexible underwriting guidelines.

In 2006, the bank made 439 innovative or flexible loans in its assessment area, with a total dollar volume of \$68.2 million.

The bank’s flexible or innovative lending programs include:

- Eastern Bank First Time Homebuyer Program
- Massachusetts Housing Finance Agency programs
- Massachusetts Housing Partnership first mortgage and Soft Second loans
- Federal Housing Administration mortgage loans
- Federal National Mortgage Association Flexible 97 and Flexible 100 loan programs

Additionally, Eastern Bank is a designated Preferred Small Business Administration Lender, and offers loans through a number of SBA guaranty programs that make credit available to businesses that may not otherwise qualify for credit.

Investment Test

Lending Test Rating: OUTSTANDING¹²¹

The institution’s Investment Test performance is rated “Outstanding.” The level of qualified investment and grant activity is excellent and demonstrates excellent responsiveness to credit and community development needs. The institution significantly uses innovative or complex investments to support community development initiatives.

The amount of the bank’s total qualified investments, commitments, and grants is \$54,049,954. This total includes \$10,360,250 in new investments made since the previous

¹²¹ Ibid.

evaluation, \$38,836,805 in prior investments still held by the institution, \$1,446,216 in unfunded commitments, and \$3,406,683 in qualified donations. Excluding the unfunded commitments, the amount of the bank’s qualified investments represents 8.0% of the bank’s Tier 1 Capital as of March 31, 2007. This ratio demonstrates the bank’s commitment to investing in community development initiatives.

Eastern Bank made qualified grants totaling \$3,406,683 during the current evaluation period. This total represents approximately 42.6% of total contributions made between April 21, 2004 and March 31, 2007.

The vast majority of Eastern Bank’s qualified grant investments are made through the Eastern Bank Charitable Foundation. The bank has pledged to give 10% of net earnings to the Foundation; in 2007, it contributed \$9.2 million.¹²² Grants totaling \$3,846,792 were made during 2007 to charitable organizations throughout Eastern Massachusetts.¹²³

The Charitable Foundation extended \$8,008,898 in total grants between April 1, 2004 and March 31, 2007, which further demonstrates the bank’s commitment to supporting non-profit organizations with diverse missions and goals.¹²⁴ In 2006, *Boston Business Journal* ranked the bank as the fifth-largest charitable donor per employee in Massachusetts.¹²⁵

Service Test

Lending Test Rating: OUTSTANDING¹²⁶

Description of Service-Delivery Systems

The institution’s Service Test performance is rated “Outstanding.”

The bank’s retail banking services are considered 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

¹²² Eastern Bank Charitable Foundation Annual Report 2007
¹²³ Eastern Bank Website.
¹²⁴ Based on most recent CRA Performance Evaluation by FDIC published 2007.
¹²⁵ Eastern Bank 2006 Annual Report.
¹²⁶ Based on most recent CRA Performance Evaluation by FDIC published 2007.



services targeting low- and moderate-income individuals.

Eastern Bank’s business hours vary by branch location; however, virtually all offices offer extended hours at least one evening during the week, and the majority offer Saturday hours. In addition, many of the Bank’s branches offer drive-up transaction windows, which further increase access to the Bank’s services.

Eastern Bank is a participant in the Massachusetts Community and Banking Council's Basic Banking Program. The purpose of the program is to encourage financial institutions to offer low-cost checking and savings accounts for people with modest incomes. The bank offers low-cost checking and savings accounts that meet the standards for the “Basic Banking for Massachusetts” program.

Community Development Services

Eastern Bank’s community development services are excellent. The bank has taken a leadership role in promoting affordable housing and economic development throughout its assessment area. The bank has been involved in numerous training events and seminars, the majority of which target low- and moderate-income individuals. Bank employees at various levels have contributed technical and financial expertise to several community organizations throughout the assessment area.

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 build personal financial skills of adults and teenagers. The bank has invested in a training program for employees utilizing the FDIC’s Money Smart program. Currently, the bank has 52 certified Money Smart trainers who conduct classes in both English and Spanish for high school students and community organizations.

Between April 2004 and March 2007, the bank has been involved in 57 homebuyer seminars and 29 financial literacy training events.

Eastern Bank’s Directors, Officers, and employees at various levels actively seek opportunities for participation in, and are actively involved with, several community development organizations throughout the

assessment area. Bank personnel lend their technical and financial expertise, experience, and judgment to these organizations. In 2006, 70 Eastern Bank employees of all levels were involved in approximately 94 community development organizations.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
101 Federal Street Boston, MA 02110	✓	✓
470 West Broadway South Boston, MA 02127	✓	✓
265 Franklin Street Boston, MA 02110-3113	✓	✓
246 Border Street East Boston, MA 02128	✓	✓

FSB: Full Service Branch



Year-Over-Year at a Glance

HMDA And Low-Income Loans

Between 2004 and 2005, Eastern Bank's HMDA lending increased significantly: the number of HMDA loans and low-income loans originated both increased by over 50%.

In 2006 and 2007, HMDA lending remained relatively steady. Low-income applications and originations fell in 2007 by 31%, though the bank originated 87% of low-income applications received.¹²⁷

	2005	2006	2007
HMDA Applications Received	308	314	327
HMDA Loans Originated	251	232	258
Low-Income Applications Received	35	45	23
Low-Income Loans Originated	28	29	20

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			
	2005	2006	2007
Low	1.4%	1.1%	0.9%
Moderate	0.8%	0.6%	0.5%
Middle	1.0%	0.4%	0.3%
Upper	1.0%	0.5%	0.7%
Total	1.0%	0.6%	0.5%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2005	2006	2007
Low	9.8%	16.6%	13.4%
Moderate	3.5%	5.3%	2.8%
Middle	12.5%	6.4%	3.3%
Upper	7.2%	6.7%	6.4%
Total	8.0%	7.8%	5.5%

Please refer to the addendum The 2007 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 2007 is also compared to the 2007 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 2007 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 The 2007 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

¹²⁷ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; June 25, 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Eastern Bank 2007 Annual Report.

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

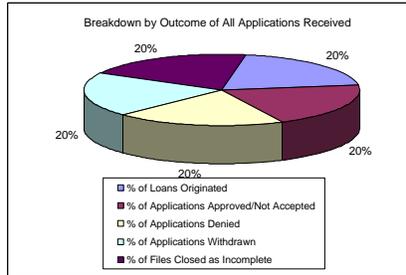
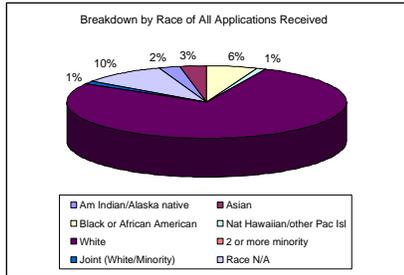
Eastern Bank website:
<http://www.easternbank.com/>

Eastern Bank HMDA Mortgage Information

2007

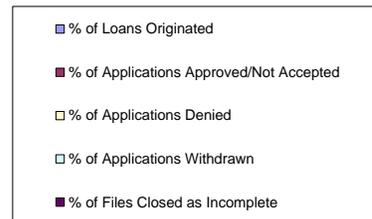
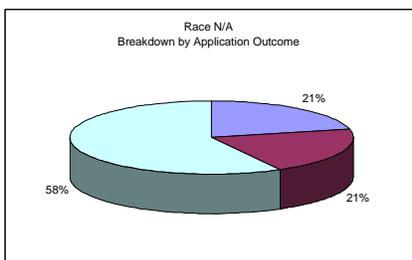
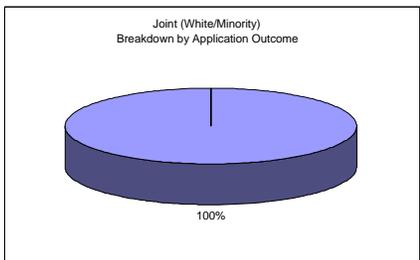
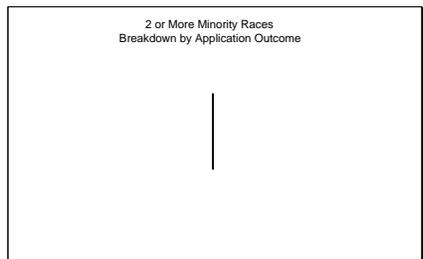
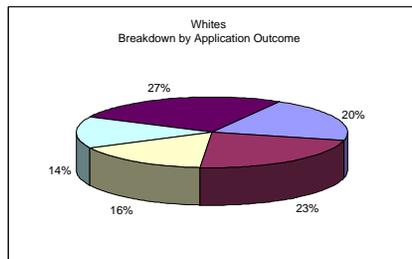
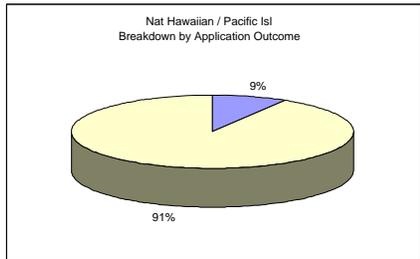
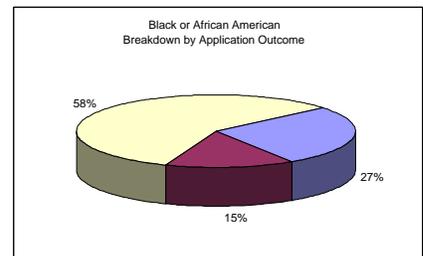
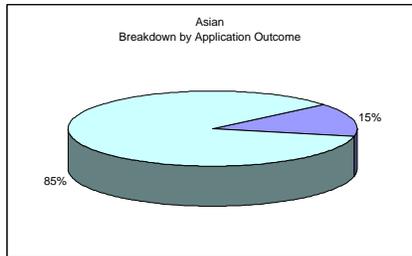
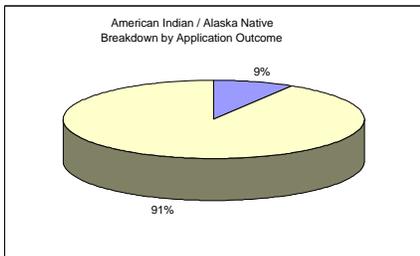
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	8	2%	4	2%	0	0%	4	17%	0	0%	0	0%
Asian	10	3%	8	3%	0	0%	0	0%	2	18%	0	0%
Black or African American	19	6%	15	6%	1	3%	3	13%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	4	1%	2	1%	0	0%	2	8%	0	0%	0	0%
White	250	76%	199	77%	27	87%	15	63%	6	55%	3	100%
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	32	10%	26	10%	3	10%	0	0%	3	27%	0	0%
Total	327	100%	258	100%	31	100%	24	100%	11	100%	3	100%

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.

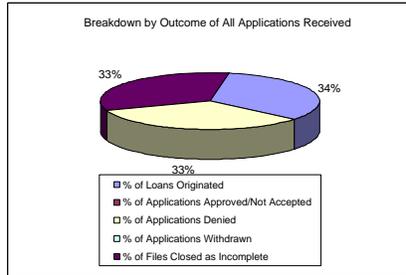
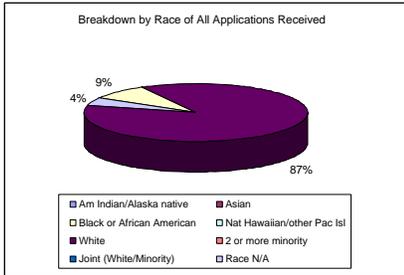


Eastern Bank Low-Income Mortgage Information

2007

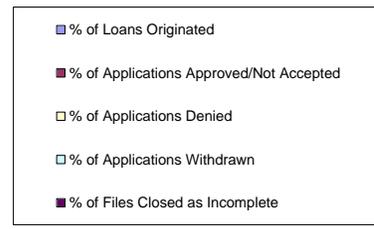
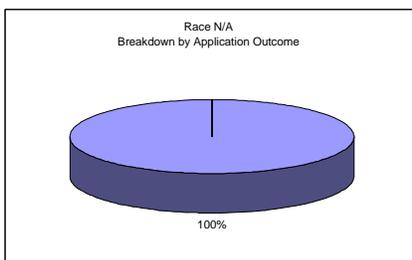
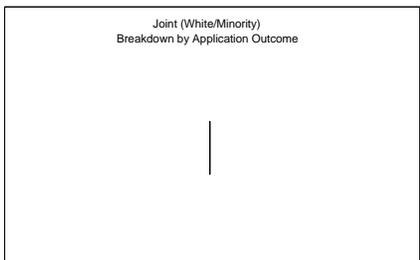
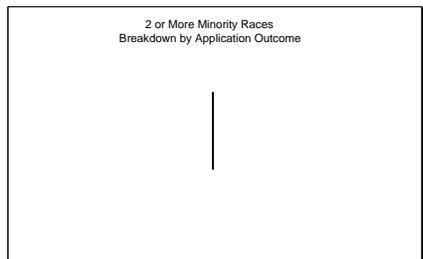
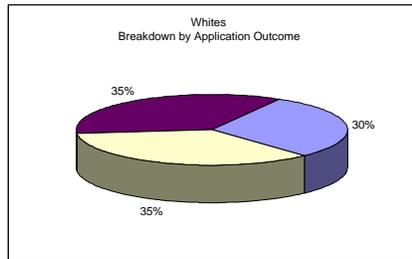
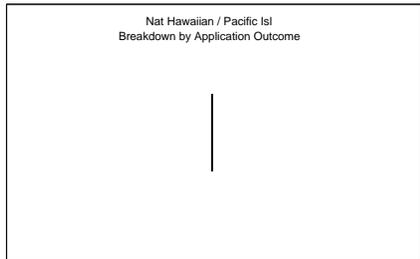
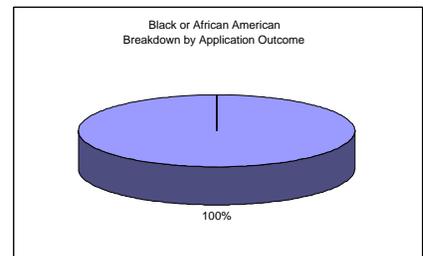
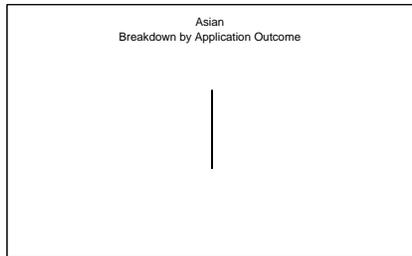
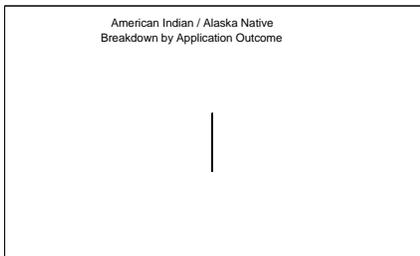
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of 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	9%	2	10%	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	20	87%	17	85%	0	0%	1	100%	0	0%	2	100%
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	4%	1	5%	0	0%	0	0%	0	0%	0	0%
Total	23	100%	20	100%	0	0%	1	100%	0	0%	2	100%

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.



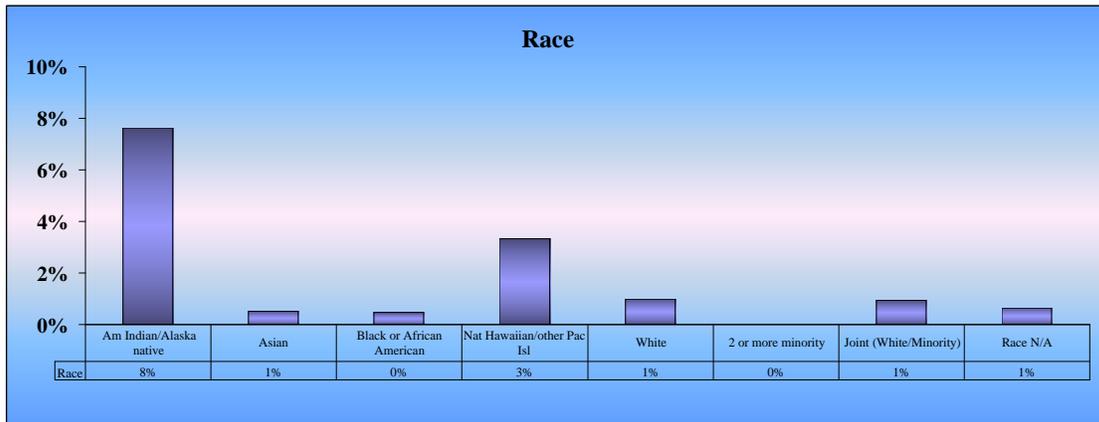
Compared against the MSA Aggregate Total

2007

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	8	3%	4	10%	0	0%	4	12%	0	0%	0	0%
Asian	10	1%	8	1%	0	0%	0	0%	2	1%	0	0%
Black or African American	19	0%	15	1%	1	0%	3	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	4	3%	2	3%	0	0%	2	9%	0	0%	0	0%
White	250	1%	199	1%	27	1%	15	0%	6	0%	3	1%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	4	1%	4	1%	0	0%	0	0%	0	0%	0	0%
Race N/A	32	1%	26	1%	3	1%	0	0%	3	1%	0	0%
Total	327	1%	258	1%	31	1%	24	0%	11	0%	3	0%

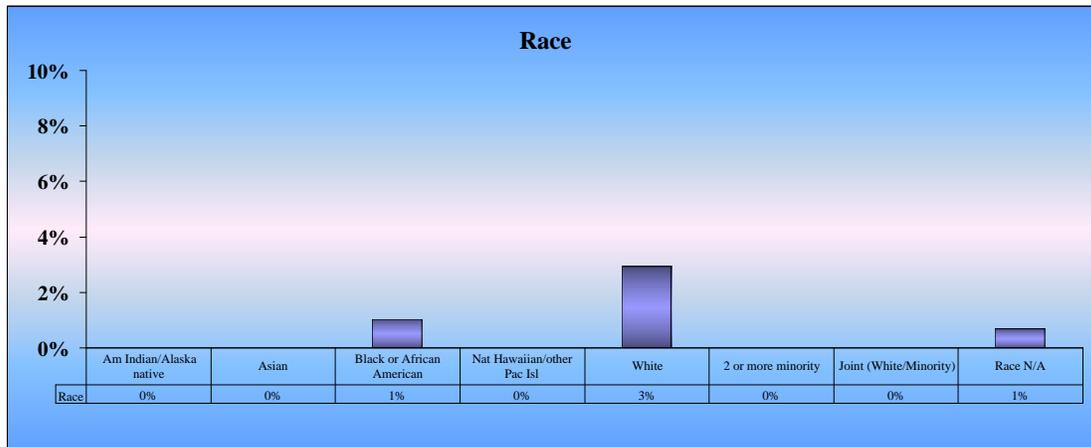
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Eastern Bank 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	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	20	3%	17	4%	0	0%	1	1%	0	0%	2	10%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	1%	1	2%	0	0%	0	0%	0	0%	0	0%
Total	23	2%	20	3%	0	0%	1	0%	0	0%	2	7%

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





Employment Information

No data available





Hyde Park Cooperative Bank



Hyde Park Cooperative Bank

Overview

Hyde Park Cooperative Bank
1172 River Street
Hyde Park, MA 02136

Description

Hyde Park Cooperative Bank is a state-chartered thrift with principal offices in Boston, Massachusetts and assets of \$131.6 million.

Hyde Park Cooperative Bank participates in first-time homebuyer programs and a Soft Second program. Its primary focus is residential mortgage lending. In 2007, Hyde Park Cooperative operated three branches in Boston.

At the end of 2008, Hyde Park Cooperative Bank merged with Commonwealth Cooperative Bank. The combined bank, known as Commonwealth Cooperative Bank, has a combined asset size of \$200 million.

Principal Officers

CEO & Chairman

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

President

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

CFO

Robert A. Nelson
1172 River Street
Hyde Park, MA 02136
617-364-6000

Chief Compliance Officer

Robert A. Nelson
1172 River Street
Hyde Park, MA 02136
617-364-6000

Employees

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

Branches

Number of Branches - Total	3
Branches Within Boston PSMA	3
Number of ATMs	4
Number of Free-Standing ATMs	1

CRA Rating

Rating Agency	Office of Thrift Supervision
Most Recent Rating	2004
Overall Rating	SATISFACTORY¹²⁸
Lending Test Rating	NOT RATED
Investment Test Rating	NOT RATED
Service Test Rating	NOT RATED

¹²⁸ Based on most recent CRA Performance Evaluation by OTS published 2004.



Discussion

Overall rating: SATISFACTORY¹²⁹

Between 1999 and 2003, the bank’s total loan portfolio grew only \$10.4 million, while the investment portfolio (including mortgage-backed securities) grew by more than double the rate of loans from \$35 million to \$56.6 million.

Lending Test

Lending Test Rating: NOT RATED

The institution did not make any loans in low-income geographies during the OTS review period of 2000-2003. Although the institution did not make any loans in low-income geographies, performance was better than HMDA aggregate reporters in moderate-income geographies for both 2002 and the review period.¹³⁰

General Responsiveness to Credit Needs

In 2005, Hyde Park Cooperative made two low-income mortgage loans. During that same period, Hyde Park Cooperative received 29 HMDA-reportable loan applications and originated 26 loans. In 2006 Hyde Park Cooperative Bank originated no HMDA-reportable low-income mortgage loans, though it originated two in 2007.¹³¹

Responsiveness to Low- and Moderate-Income Credit Needs

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

- First-Time Buyer Program
- Soft Second Program
- Boston Home Certificate
- Construction Loans
- Conforming Fixed Rate Mortgages
- Conforming ARM Mortgages
- Equity Loans and Lines of Credit

- Consumer Loans, including: Home-Improvement, Auto and Personal Loans.

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
733 Centre Street Jamaica Plain, MA	✓	✓
1172 River Street Hyde Park, MA	✓	✓
Two Center Plaza Boston, MA	✓	✓
46 Fairmount Avenue Hyde Park, MA 02136	✓	

FSB: Full Service Branch

Additional Information

Corporate Donations:

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

¹²⁹ Based on most recent CRA Performance Evaluation by OTS published 2004.

¹³⁰ Ibid.

¹³¹ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

Hyde Park Cooperative Bank's 2005 HMDA lending was consistent with its 2004 lending levels. In 2006, its HMDA lending increased 27%, though the bank received no low-income loan applications.

In 2007, the bank's HMDA lending dropped by 21%, though it originated 96% of all applications received.¹³²

	2005	2006	2007
HMDA Applications Received	29	43	25
HMDA Loans Originated	26	33	24
Low-Income Applications Received	2	0	2
Low-Income Loans Originated	2	0	2

Small Business Loans

No 2007 HMDA-reportable small business loan data was available for Hyde Park Cooperative Bank.¹³³

Loan Information By Census Tract

Please refer to the addendum The 2007 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

¹³² FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System, 2007.

¹³³ Ibid.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of Thrift Supervision; March 17, 2004.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Massachusetts Division of Banks, Summary Information for State Chartered Banks and Credit Unions:

<http://db.state.ma.us/dob/in-choose.asp>

Hyde Park Cooperative Bank website:

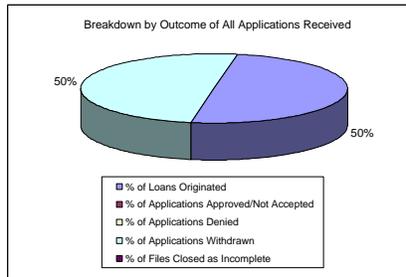
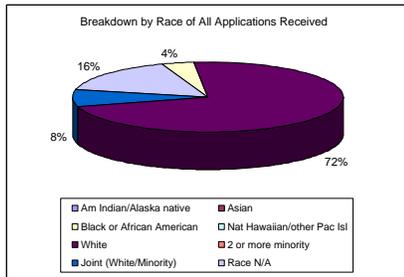
<http://www.hydeparkcooperative.com/>

Hyde Park Cooperative Bank HMDA Mortgage Information

2007

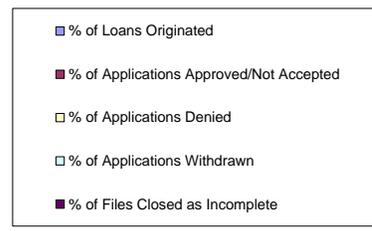
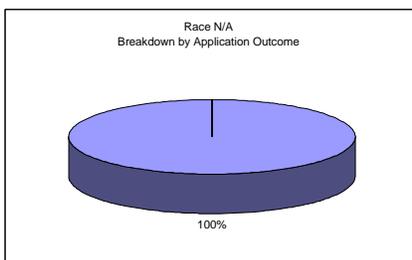
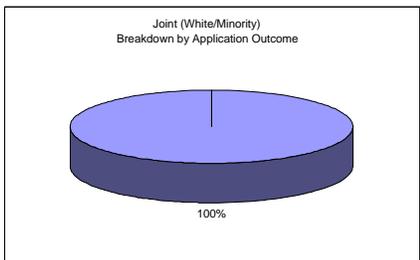
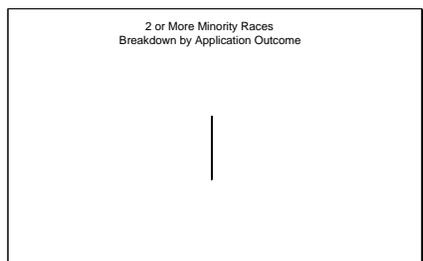
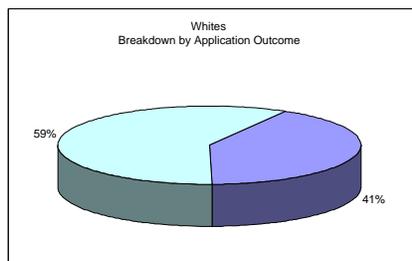
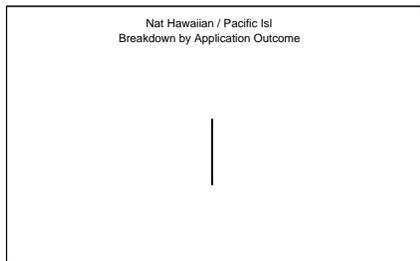
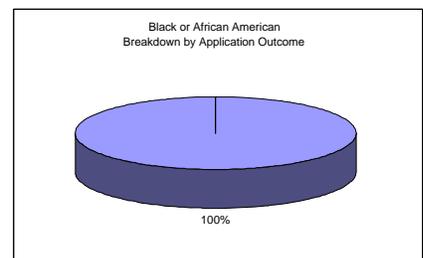
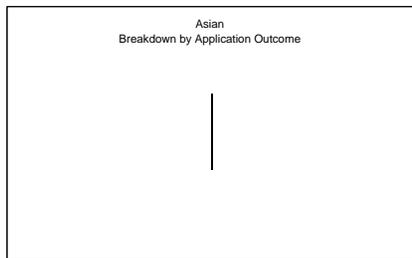
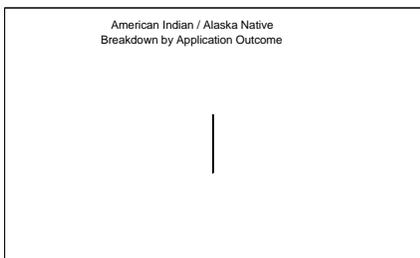
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	1	4%	1	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	18	72%	17	71%	0	0%	0	0%	1	100%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	8%	2	8%	0	0%	0	0%	0	0%	0	0%
Race N/A	4	16%	4	17%	0	0%	0	0%	0	0%	0	0%
Total	25	100%	24	100%	0	0%	0	0%	1	100%	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.



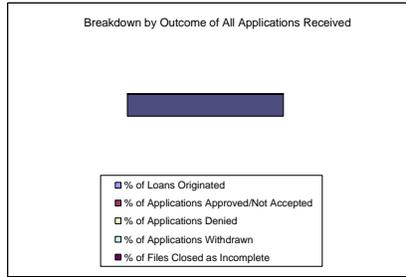
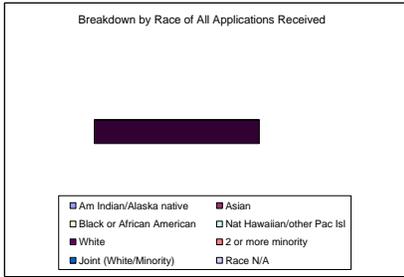
Hyde Park Cooperative Bank Low-Income Mortgage Information

Note: No Data Reported For "Less Than 50% OF MSA/MD Median"

2007

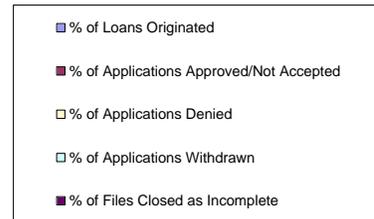
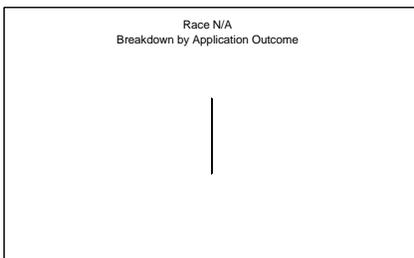
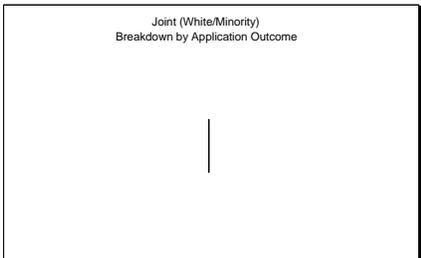
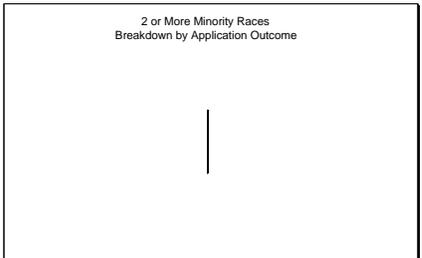
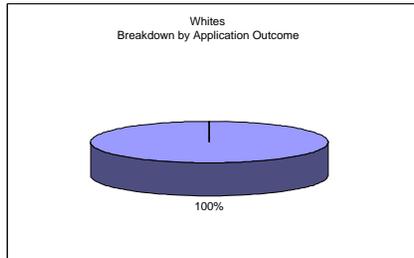
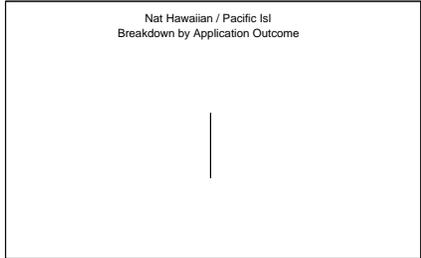
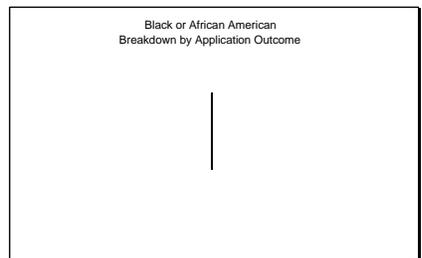
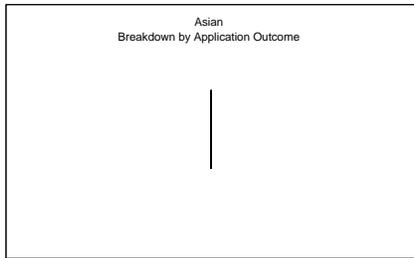
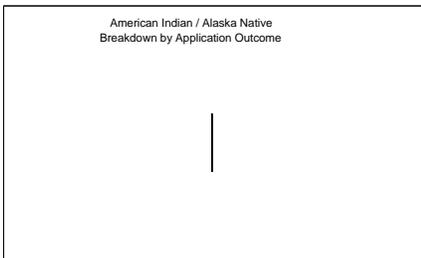
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of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

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



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

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



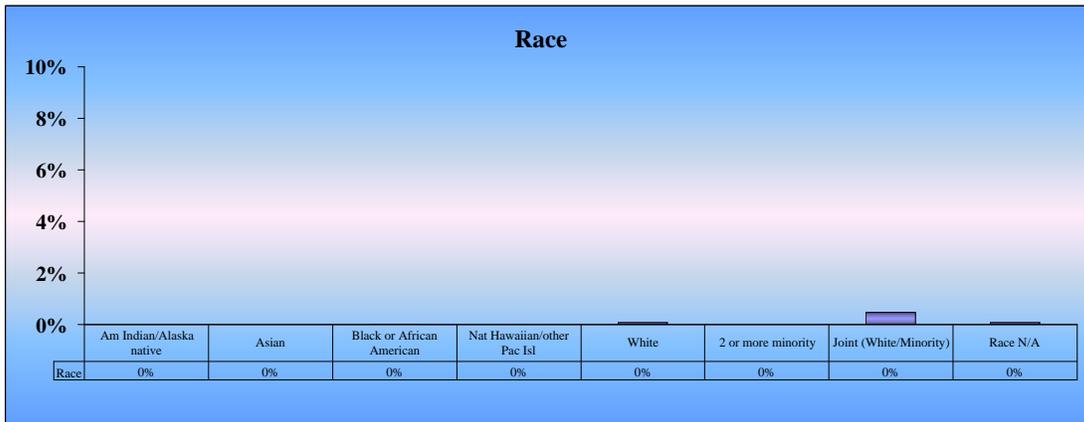
Compared against the MSA Aggregate Total

2007

Hvde Park Cooperative Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	1	0%	1	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	18	0%	17	0%	0	0%	0	0%	1	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	0%	2	1%	0	0%	0	0%	0	0%	0	0%
Race N/A	4	0%	4	0%	0	0%	0	0%	0	0%	0	0%
Total	25	0%	24	0%	0	0%	0	0%	1	0%	0	0%

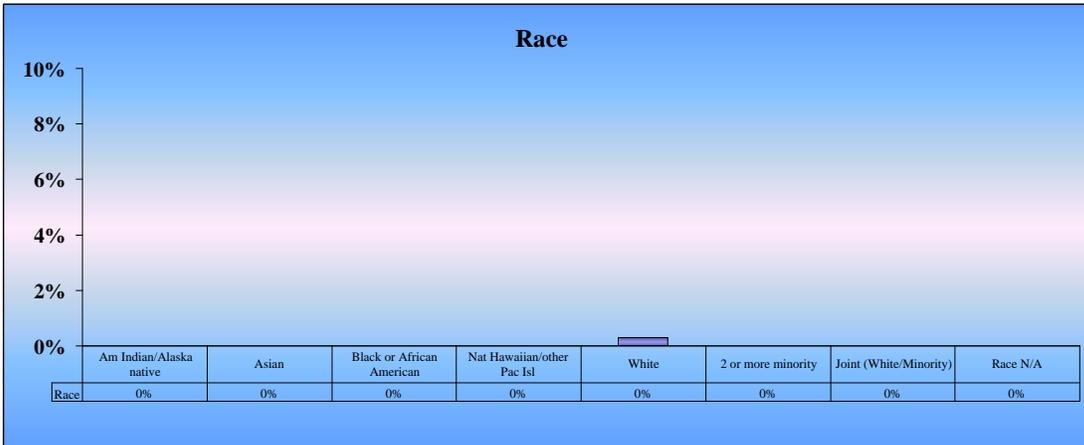
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Hvde Park Cooperative Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
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%	2	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	2	0%	2	0%	0	0%	0	0%	0	0%	0	0%

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





Employment Information

No data available







Hyde Park Savings Bank



Hyde Park Savings Bank Overview

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

Description

The Hyde Park Savings Bank is a state-chartered, mutual savings institution headquartered in the Hyde Park section of the City of Boston. The bank was founded in 1871 and has been operating continuously from its River Street office for the past 135 years.

The bank’s assets total \$980.4 million. The bank is almost exclusively a residential mortgage lender with 97.4% of all loans secured by one-to-four family residential properties.

Principal Officers

CEO & President

Kenneth Pierog
 1196 River Street
 Hyde Park, MA 02136
 617-361-6900

CFO

Steve McNulty
 1196 River Street
 Hyde Park, MA 02136
 617-361-6900

Chief Compliance Officer

Paul Bunker
 1196 River Street
 Hyde Park, MA 02136
 617-361-6900

Employees

Number of Employees	108 ¹³⁴
Number of Employees in Massachusetts	108
Percentage of Women Employees	71%
Percentage of Minority Employees	22%

Branches

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

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2006
Overall Rating	SATISFACTORY ¹³⁵
Lending Test Rating	LOW SATISFACTORY
Investment Test Rating	LOW SATISFACTORY
Service Test Rating	HIGH SATISFACTORY

¹³⁴ FDIC Institution Directory

¹³⁵ Based on most recent CRA Performance Evaluation by FDIC published 2006.



Discussion

Overall rating: SATISFACTORY¹³⁶

Lending Test

Lending Test Rating: LOW SATISFACTORY¹³⁷

General Responsiveness to Credit Needs

With 97.4% of the loan portfolio secured by first and second mortgages on one- to four-family residential properties, Hyde Park Savings Bank is primarily a home mortgage lender.

Hyde Park Saving Bank's lending activity displays an adequate degree of responsiveness to the assessment area's credit needs. The primary concern is the bank's relatively low lending levels. In the years 2001-2004 HMDA loans per annum declined to less than half of the number reported in 2000.¹³⁸ In 2004, the bank originated 186 HMDA loans totaling \$73.5 million. Other similarly-situated institutions originated 500 to 700 HMDA loans totaling \$140.0 million to \$184.0 million during the same period, a level that ranges from two to four times the volume originated by the bank.

There has been some recent improvement. In 2005, the bank's lending within its assessment area increased slightly to 178 loans totaling \$40.2 million. Total loans reported on the bank's balance sheet increased 16.5% during the first six months of 2006 from \$168.3 million to \$196.1 million. The bank's HMDA lending increased significantly between 2004 and 2005, and increased significantly in 2006 and 2007.¹³⁹ This increase reflects management's actions to improve the bank's responsiveness to community credit needs.¹⁴⁰

Responsiveness to Low- and Moderate-Income Credit Needs

The distribution of the bank's residential mortgages to borrowers of different incomes

reflects a good level of penetration among retail customers of different incomes.

During 2005, home purchase loan activity among low-income families increased from no loans in 2004 to 4.4% of the bank's home purchase lending in the assessment area. 20.0% of the bank's home purchase loans were made to moderate-income borrowers. This is well above both the 14.70% aggregate level and the 15.35% representation of moderate-income families in the local population.

Hyde Park Savings Bank uses innovative and flexible lending practices to better serve the assessment area's credit needs. Hyde Park Savings Bank participates in the following programs to assist low-income borrowers:

- The First-time Homebuyer Program
- Soft Second Affordable First Time Home Buyer Program
- The "Free Choice" Mortgage Loan
- Nuestra Comunidad Development Corporation
- Ensuring Stability Through Action in Our Community (ESAC)

Leadership in Community-Development Loans

Management has displayed a good level of support for community development initiatives since the previous examination by originating community development loans totaling \$6.2 million.

The following are the loans the bank has extended for community development purposes:

- Boston Community Loan Fund: \$1.0 million equity investment.
- The Most Visible Properties Program: Recently refinanced two mortgage loans (totaling \$1.1 million) originally granted under the program. Has not granted any new loans since the last CRA evaluation.

¹³⁶ Based on most recent CRA Performance Evaluation by FDIC published 2006.

¹³⁷ Ibid

¹³⁸ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System, 2007.

¹³⁹ Ibid.

¹⁴⁰ Based on the most recent CRA Performance Evaluation by FDIC published 2006.



Investment Test

Investment Test Rating: LOW
SATISFACTORY¹⁴¹

Hyde Park Savings Bank has qualified investments totaling \$4.6 million. This is an adequate level of qualified investments and reflects adequate responsiveness to the community development needs of the assessment area. The bank's community development investments represent less than 1.0% of the bank's \$627.7 million investment portfolio.

Of the \$221.6 million in new investments that management has made since the previous examination, only 0.05%, represent qualified investments. This new investment was made to aid in recovery efforts following Hurricane Katrina and represents a \$100,000 certificate of deposit at a minority-owned bank in Louisiana.

The bank's other qualified investments are:

- FNMA Guaranteed Mortgage Pass-through Certificates: Book value of \$1.1 million.
- CRA Fund Advisors - CRA Qualified Investment Fund: Two investments, book value of \$350,000.
- Massachusetts Business Development Corporation (MBDC): Three investments, book value of \$30,951.
- Access Capital Strategies - Community Investment Funds: Book value \$500,000.
- Massachusetts Housing Investment Corporation (MHIC): Book value \$350,000.
- Government National Mortgage Corporation (GNMA): Book value \$2.2 million.

The bank also makes contributions to local community development organizations. During the rating period, the bank donated approximately \$66,600, or 0.18% of pre-tax net operating income. Recipients include the Ecumenical Social Action Committee, Hyde Park Main Streets, and the Massachusetts Affordable Housing Alliance.

Service Test

Service Test Rating: HIGH
SATISFACTORY¹⁴²

Description of Service-Delivery Systems

HPSB operates from its main office and four full-service branch offices. The main office in Hyde Park is located in a moderate-income census tract, the Readville (Hyde Park) and Norwood branch offices are located in middle-income census tracts, and the Dedham and West Roxbury offices are located in upper-income census tracts. All offices are open Saturday morning and at least one evening each week.

Twenty-four hour ATMs are located at each of the bank's five offices. The bank is a member of the SUM surcharge-free network.

Bank by Mail, Bank by Phone, and Internet Banking services are also available. Applications for residential mortgages and home equity loans can also be made online.

The bank opened one branch office (in West Roxbury, an upper-income census tract) since the previous FDIC examination. The building also houses the bank's loan center, which was formerly at the bank's Truman Parkway branch in Hyde Park.

Community Development Services

HPSB provides a high level of community development services. The bank participates in many programs that are of special interest or benefit to low- and moderate-income consumers. These include:

- Voluntary government check-cashing program and the public assistance check direct deposit program.
- The Massachusetts Community and Banking Council's (MCBC) Basic Banking program. Offers low-cost checking and savings accounts to low- and moderate-income individuals.
- The Massachusetts Bankers Association Foreclosure Prevention Project. Provides financial counseling and education to low- and moderate-income homeowners across Massachusetts.

¹⁴¹ Ibid

¹⁴² Based on most recent CRA Performance Evaluation by FDIC published 2006.



- Ecumenical Social Action Committee’s Sustainable Homeownership Program. Counsels homeowners on the verge of foreclosure. Has refinanced seven distressed homeowners since 2002.

The bank has also conducted or participated in a number of workshops, educational programs, and seminars to educate the public in personal financial matters and the considerations involved in purchasing a home.

Branch Information

Branch locations in the Boston MSA:

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

FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Hyde Park Savings Bank’s HMDA-reportable lending increased significantly in 2005, with HMDA applications and loans increasing by over 40%. 2006 lending levels increased in both categories, despite decreases in the number of applications received.¹⁴³

In 2007, HMDA applications and originations leaped by 43% and 35% respectively.

	2005	2006	2007
HMDA Applications Received	72	70	100
HMDA Loans Originated	55	60	81
Low-Income Applications Received	5	4	3
Low-Income Loans Originated	3	4	2

Small Business Loans

No 2007 HMDA-reportable small business loan data was available for Hyde Park Savings Bank.¹⁴⁴

Loan Information By Census Tract

Please refer to the addendum The 2007 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

¹⁴³ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System, 2007.

¹⁴⁴ Ibid.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; August 14, 2006.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

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

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

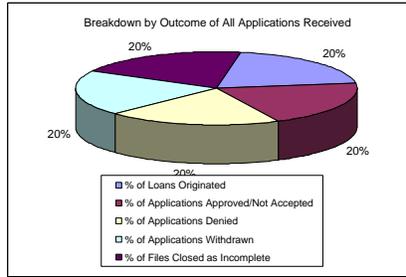
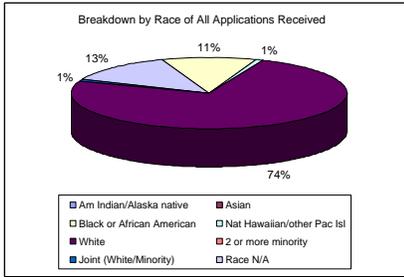
Hyde Park Savings Bank website:
<http://www.hydeparkbank.com/>

Hyde Park Savings Bank HMDA Mortgage Information

2007

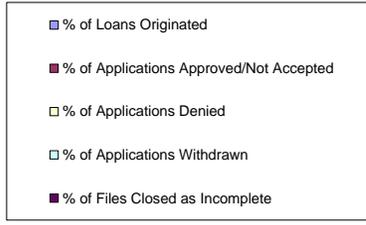
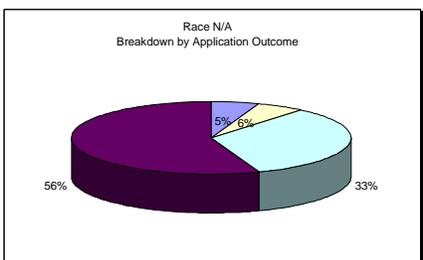
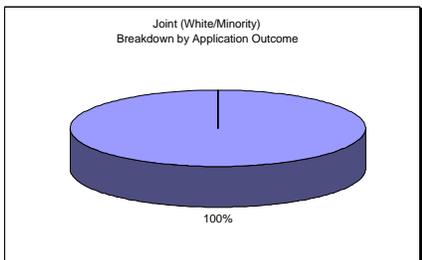
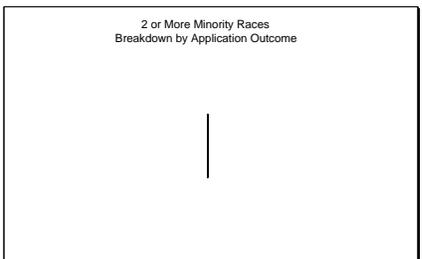
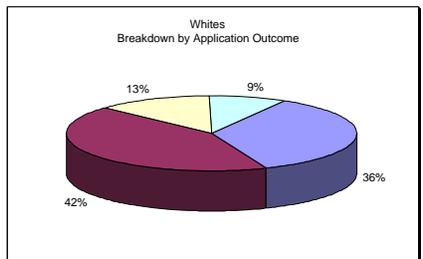
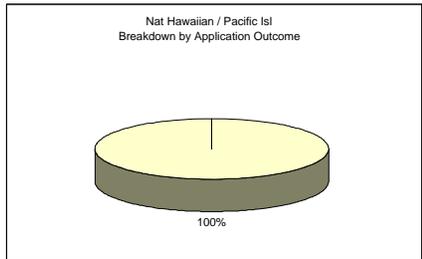
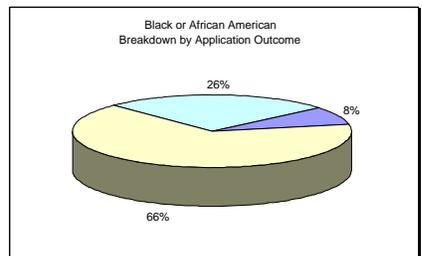
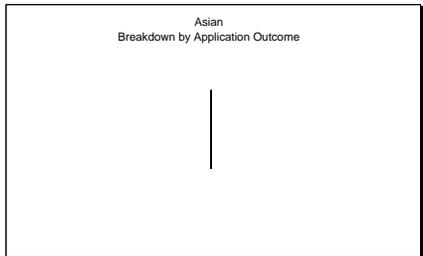
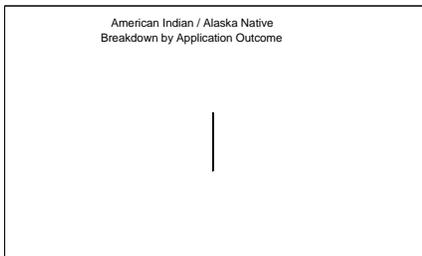
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of 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	11	11%	5	6%	0	0%	5	50%	1	20%	0	0%
Nat Hawaiian/other Pac Isl	1	1%	0	0%	0	0%	1	10%	0	0%	0	0%
White	74	74%	67	83%	3	100%	3	30%	1	20%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	1%	1	1%	0	0%	0	0%	0	0%	0	0%
Race N/A	13	13%	8	10%	0	0%	1	10%	3	60%	1	100%
Total	100	100%	81	100%	3	100%	10	100%	5	100%	1	100%

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.

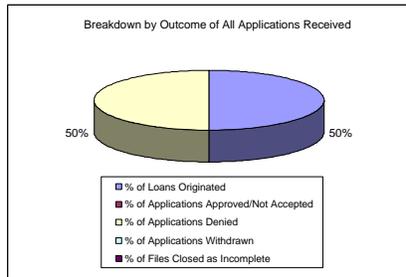
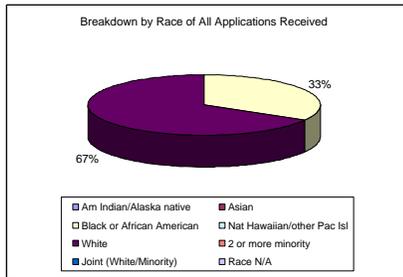


Hyde Park Savings Bank Low-Income Mortgage Information

2007

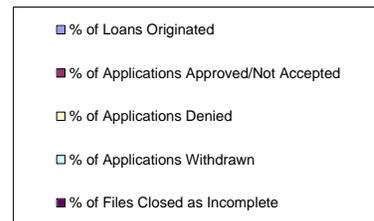
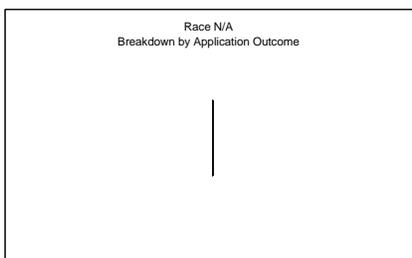
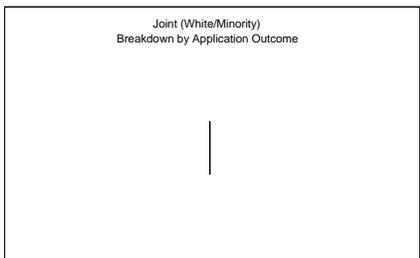
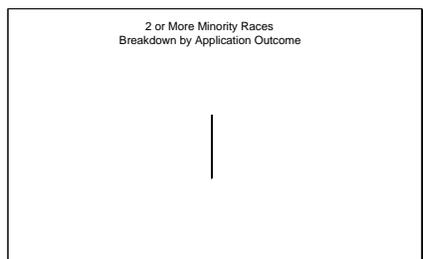
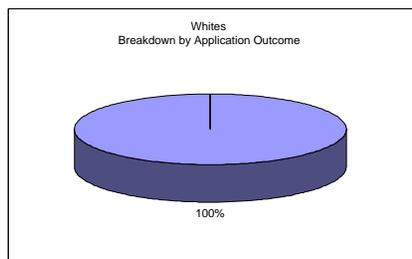
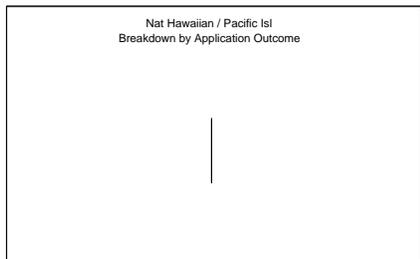
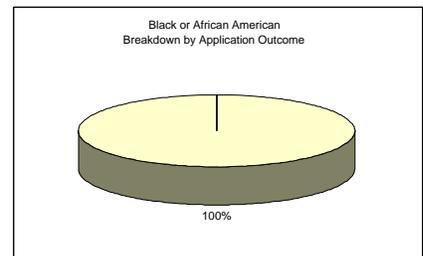
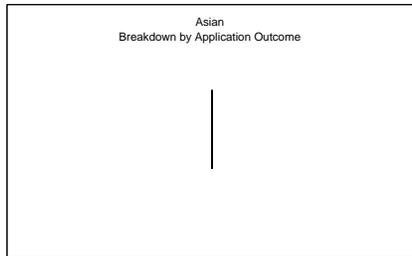
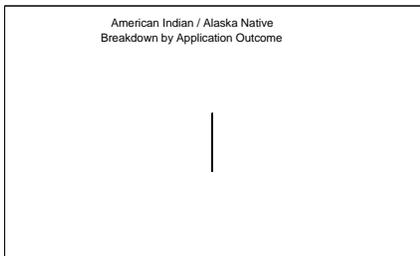
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of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



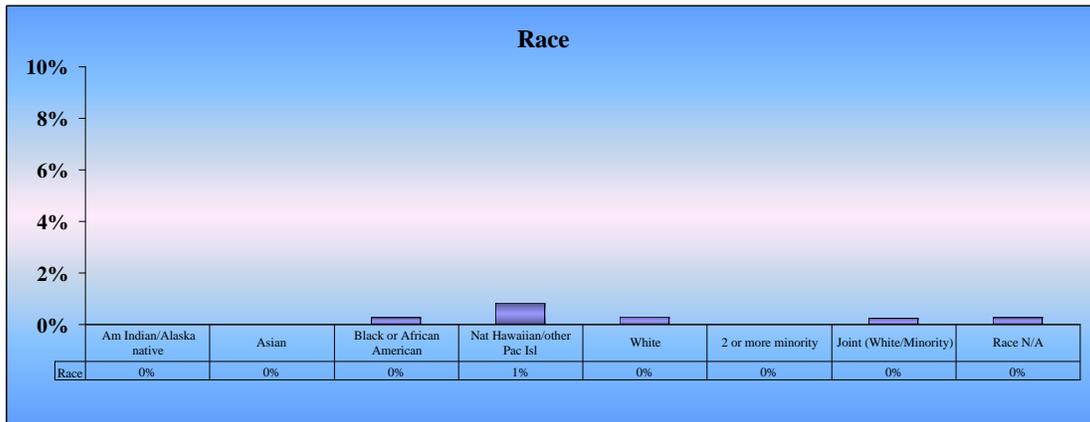
Compared against the MSA Aggregate Total

2007

Hyde Park Savings Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
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	11	0%	5	0%	0	0%	5	0%	1	0%	0	0%
Nat Hawaiian/other Pac Isl	1	1%	0	0%	0	0%	1	4%	0	0%	0	0%
White	74	0%	67	0%	3	0%	3	0%	1	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	0%	1	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	13	0%	8	0%	0	0%	1	0%	3	1%	1	1%
Total	100	0%	81	0%	3	0%	10	0%	5	0%	1	0%

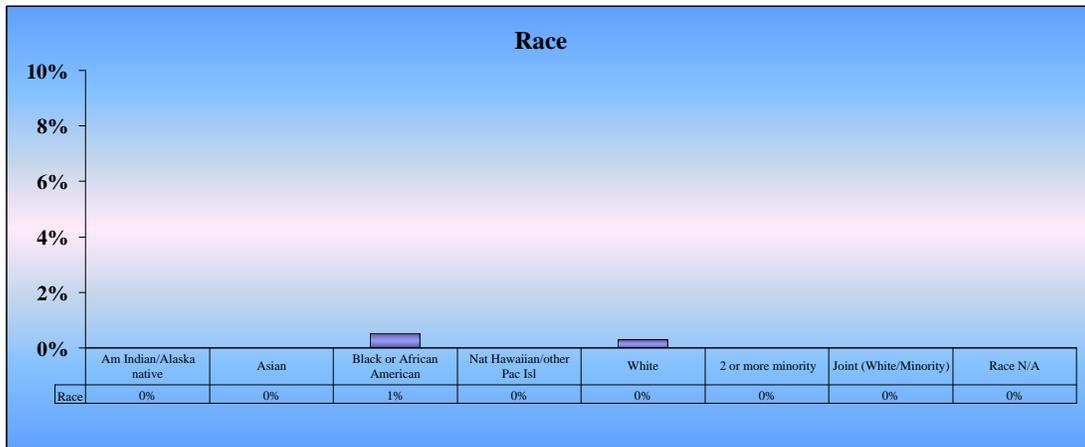
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Hyde Park Savings Bank Low-Income Mortgage Information

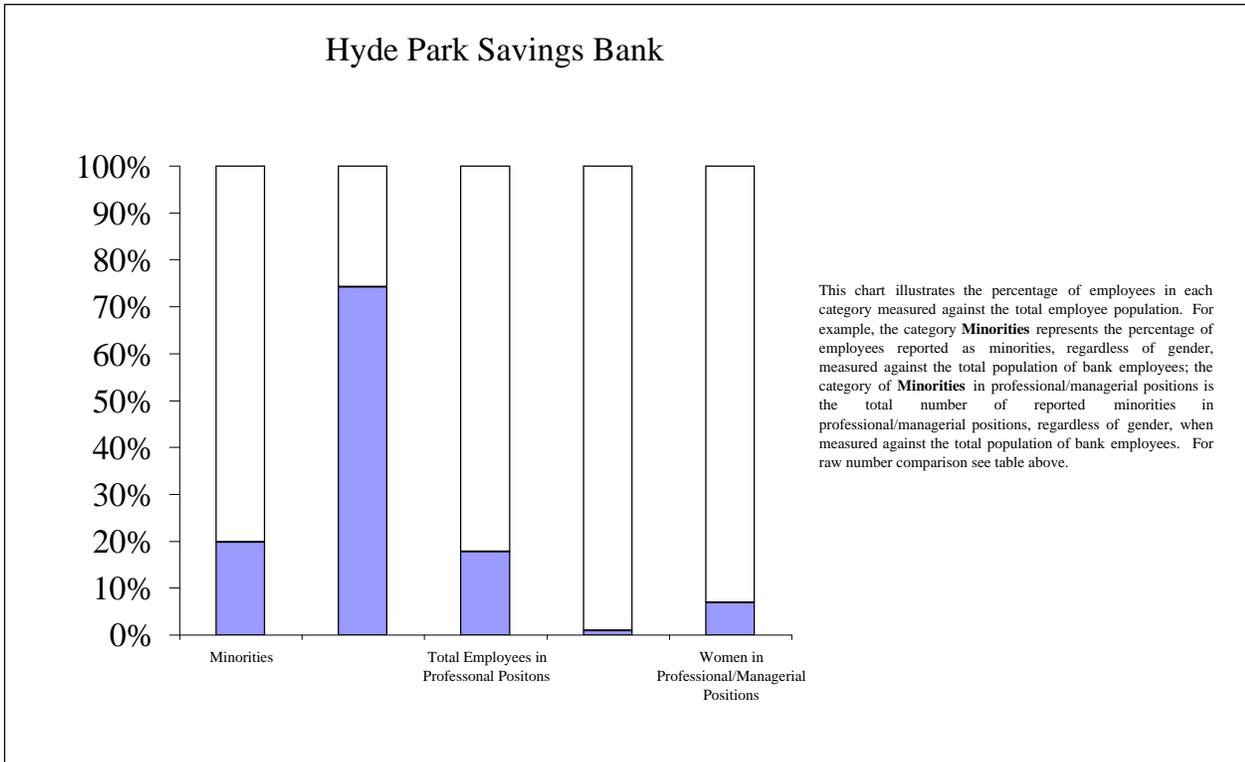
Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank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

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



Hyde Park Savings Bank Employment Numbers

	Number of Employees	Percent of Total Employees
Total	101	
Minorities	20	20%
Women	75	74%
Total Employees In Professional Positions	18	18%
Minorities in Professional or Managerial Positions	1	1%
Women in Professional or Managerial Positions	7	7%







JPMorgan Chase Bank



New York, NY 10017
212-270-6000

JPMorgan Chase Bank Overview

JPMorgan Chase Bank, N.A.
270 Park Avenue
New York, New York 10017

Compliance Officer
Stephen M. Cutler
270 Park Avenue
New York, NY 10017
212-270-6000

Description

JPMorgan Chase Bank, N.A. is a subsidiary of JPMorgan Chase & Co., a global financial services firm with assets of \$1.6 trillion and operations in more than 60 countries.

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. It offers one of the largest branch networks in the United States, covering 17 states with 3,152 branches, 290 mortgage offices, and 9,186 ATMs.

The firm’s \$3.03 billion Retail Financial Services division provides consumers and small businesses with a broad range of financial products and services, including deposits, investments, loans, and insurance.

In 2006, JPMorgan Chase completed its acquisition of The Bank of New York’s consumer, small-business, and middle-market banking businesses. The acquired businesses are valued at a premium of \$2.3 billion.¹⁴⁵

No CRA information is reported about JPMorgan Chase Bank’s Massachusetts activities. The most recent review, conducted in 2003, did not include the bank’s more recent presence in Massachusetts. Ratings are provided for reference only.

Principal Officers

President and CEO, JPMorgan Chase & Co.

James Dimon
270 Park Avenue
New York, NY 10017
212-270-6000

CFO

Michael J. Cavanagh
270 Park Avenue

Employees

Number of Employees	25,000
Number of Employees in Massachusetts	994
Percentage of Women Employees	34%
Percentage of Minority Employees	23%

Branches

Number of Branches - Total	3152
Branches Within Boston PSMA	0
Number of ATMs	9186
Number of Free-Standing ATMs	6034

CRA Rating

Rating Agency	Federal Reserve Bank of New York
Most Recent Rating	2003
Overall Rating	OUTSTANDING¹⁴⁶
Lending Test Rating	OUTSTANDING
Investment Test Rating	OUTSTANDING
Service Test Rating	OUTSTANDING

¹⁴⁵ JPMorgan Chase website.

¹⁴⁶ Based on most recent CRA Performance Evaluation published by Federal Reserve Bank of New York published 2003.



Discussion

Overall rating: OUTSTANDING¹⁴⁷

JPMorgan Chase Bank (JPMC Bank) received a CRA evaluation in September 2003. **The evaluation did not include any Boston information** because the evaluation preceded the bank's presence in Massachusetts. Ratings are included below as a reference only.

Lending Test

**Lending Test Rating:
OUTSTANDING¹⁴⁸**

General Responsiveness to Credit Needs

JPMC Bank's lending activity showed excellent responsiveness to retail credit needs in the bank's assessment areas when measured in terms of the number and dollar amount of HMDA-related and small business loans originated and purchased in each assessment area.

Compared with the previous examination period (1999-2000), overall loan volume increased 44% at this CRA examination. Lower interest rates had a positive impact on refinance loan volume, which more than quadrupled. Growth in home purchase loan volume was limited. Despite the weak economy, small business lending volume increased 22%.¹⁴⁹

Responsiveness to Low- and Moderate-Income Credit Needs

The bank's overall distribution of loans among borrowers of different income levels and businesses of different sizes was excellent. The overall geographic distribution of HMDA-related and small business lending reflected good loan penetration in low- and moderate-income geographies across all rated assessment areas.¹⁵⁰

Various innovative and flexible lending products enhanced lending to low- and moderate-income borrowers and small businesses. JPMC Bank's Residential Lending Group works with local

community organizations to develop lending products and enhance existing products geared to low- and moderate-income families. During the examination period, over 12,000 such loans were originated in the bank's assessment areas.

Leadership in Community-Development Loans

JPMC Bank's community development lending performance overall and in each assessment area was outstanding, surpassing \$1.3 billion during the examination period. In addition, the bank issued \$192 million in letters of credit to support affordable housing initiatives.¹⁵¹

Throughout the assessment areas, much of JPMC Bank's community development activity emphasized direct lending initiatives and indirect lending initiatives through intermediary lenders.

JPMC Bank frequently acts as an agent for community development loan participations with other banks and local agencies. Also, each year the bank extends recoverable grants, or no-interest loans, to qualifying community development organizations in all its assessment areas.

Investment Test

**Investment Test Rating:
OUTSTANDING¹⁵²**

JPMC Bank's investment performance is rated "outstanding." JPMC Bank's investments exhibited excellent responsiveness to the most pressing credit and community development needs in the bank's assessment areas.

The bank's significant volume of qualified investments and grants totaled \$1.08 billion at this examination, which includes \$313 million in new investments made since the previous examination.

Approximately \$831 million, or 77% of total investments, were low-income housing tax credits ("LIHTCs"), which are considered complex because of accounting requirements. In addition, JPMC Bank sponsors four LIHTC funds of its own totaling \$124 million. The

¹⁴⁷ Based on most recent CRA Performance Evaluation published by Federal Reserve Bank of New York published 2003.

¹⁴⁸ Ibid.

¹⁴⁹ Ibid.

¹⁵⁰ Ibid.

¹⁵¹ Ibid.

¹⁵² Ibid.



bank's LIHTC program is an investment activity not routinely sponsored by other banks.

Service Test

Service Test Rating: OUTSTANDING¹⁵³

Description of Service-Delivery Systems

The overall JPMC Bank rating on the service test is rated "outstanding" based on outstanding performance in all assessment areas.

JPMC Bank branches were readily accessible to all portions of the bank's assessment areas.

Branch Information

JPMC Bank has no branches or ATMs in the Boston MSA. It operates one mortgage loan center in downtown Boston.

Community Development Services

JPMC Bank is a leader in providing community development services in its assessment areas. In the New York State assessment area, the bank provided a relatively high level of community development services.

The bank sponsored several workshops and seminars providing financial and other education throughout its assessment areas. Bank employees also provided technical assistance and other services to several organizations.

In addition, bank officers were members of 372 governing boards of qualifying community development organizations in the assessment areas, providing affordable housing, economic development and community services.

Additional Information

In 2004-2006, the bank fulfilled \$293 billion of an \$800 billion, 10-year commitment in the United States to provide community-development loans and investments, small business loans, and consumer mortgages for lower-income and minority households.

Year-Over-Year at a Glance

HMDA And Low-Income Loans

JPMorgan Chase Bank originated no HMDA-reportable loans in the Boston PSMA since it established a presence in Massachusetts in 2005.¹⁵⁴

	2005	2006	2007
HMDA Applications Received	0	0	0
HMDA Loans Originated	0	0	0
Low-Income Applications Received	0	0	0
Low-Income Loans Originated	0	0	0

Small Business Loans

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

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2005	2006	2007
Low	0.0%	0.3%	0.3%
Moderate	0.0%	0.2%	0.3%
Middle	0.0%	0.2%	0.2%
Upper	0.1%	0.2%	0.1%
Total	0.0%	0.2%	0.2%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2005	2006	2007
Low	0.0%	0.4%	0.3%
Moderate	0.6%	0.4%	0.6%
Middle	0.0%	0.4%	0.3%
Upper	0.3%	0.9%	0.2%
Total	0.2%	0.5%	0.4%

¹⁵³Ibid.

¹⁵⁴ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.



Please refer to the addendum The 2007 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 2007 is also compared to the 2007 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 2007 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 The 2007 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Reserve Bank of New York; September 8, 2003.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

JPMorgan Chase & Co. Annual Report 2007.

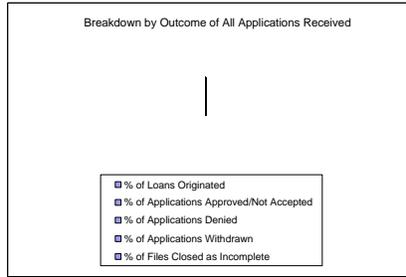
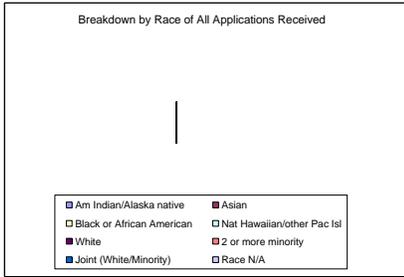
JPMorgan Chase Bank website
<http://www.jpmorganchase.com/>

JPMorgan Chase Bank HMDA Mortgage Information

2007

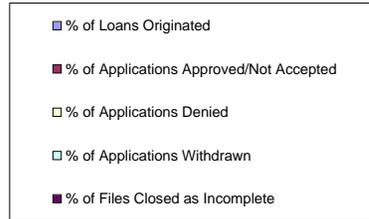
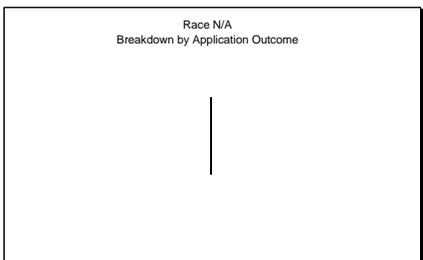
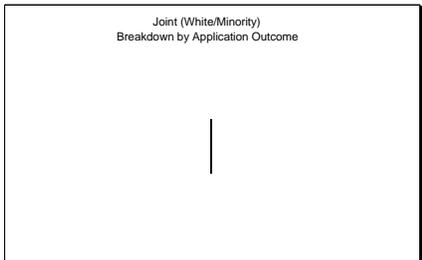
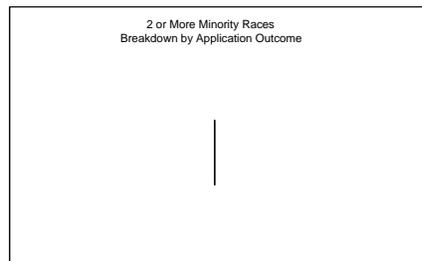
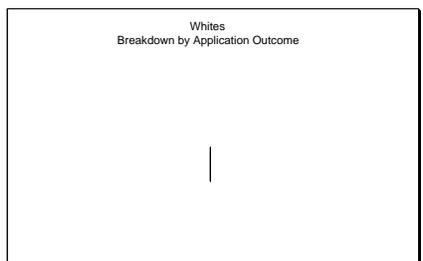
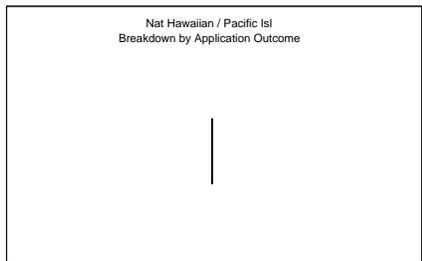
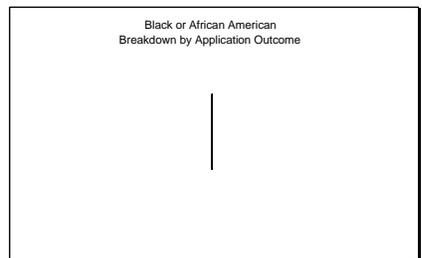
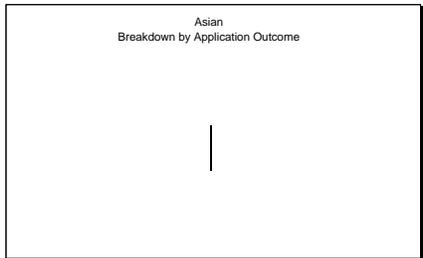
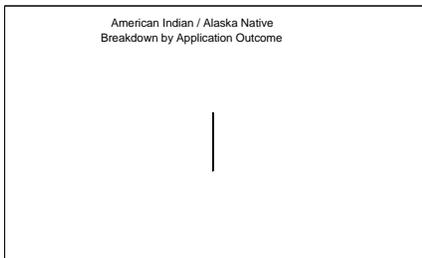
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of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

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



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

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

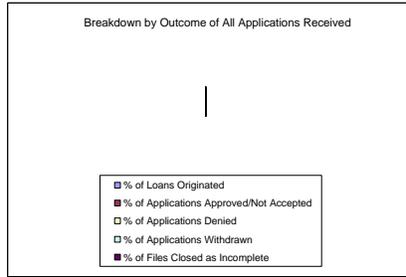
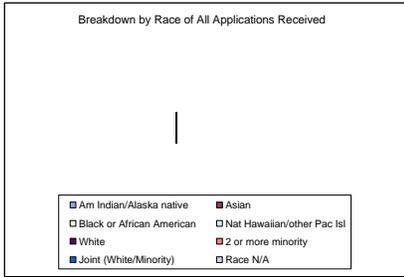


JPMorgan Chase Bank Low-Income Mortgage Information

2007

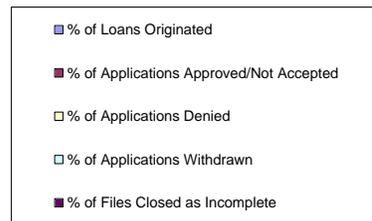
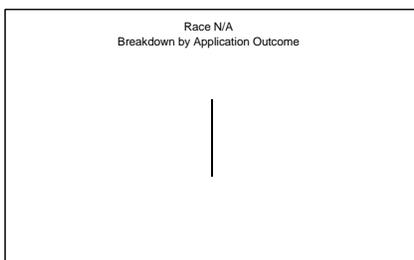
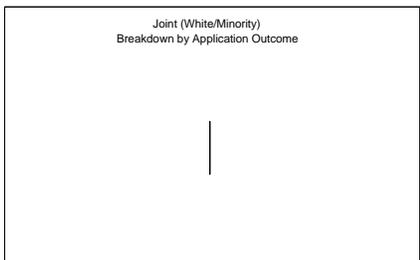
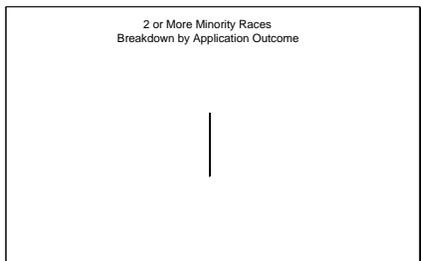
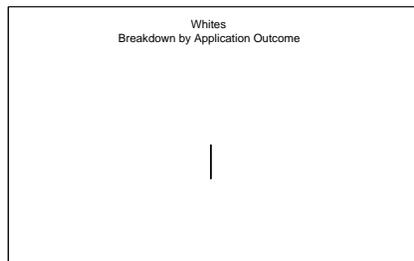
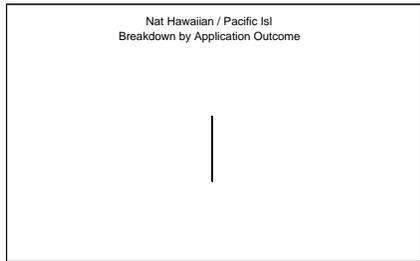
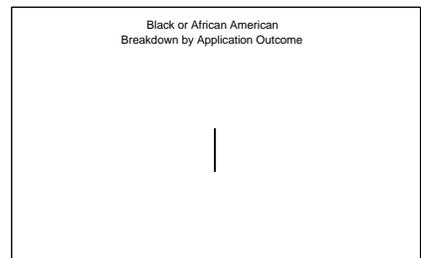
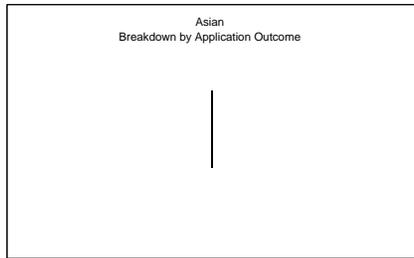
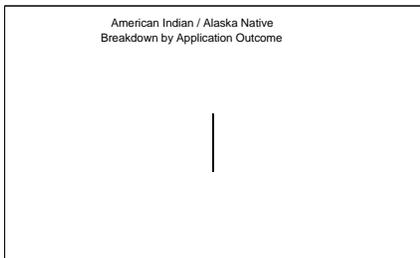
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of 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.



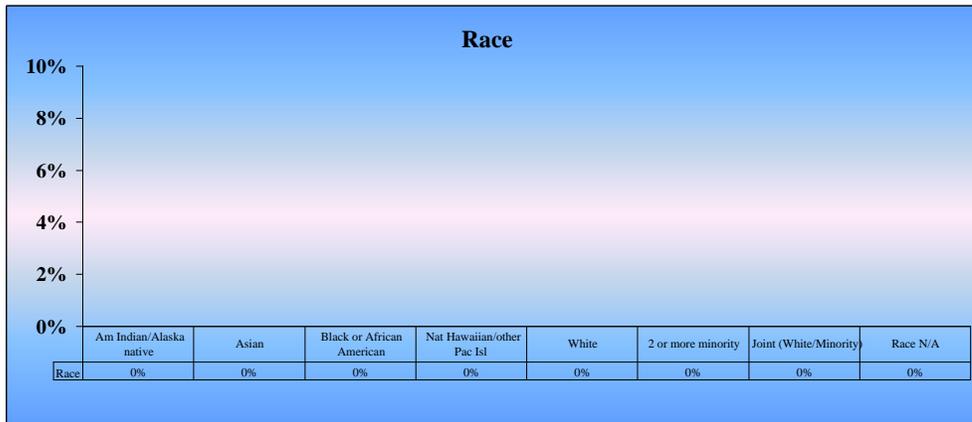
Compared against the MSA Aggregate Total

2007

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	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%

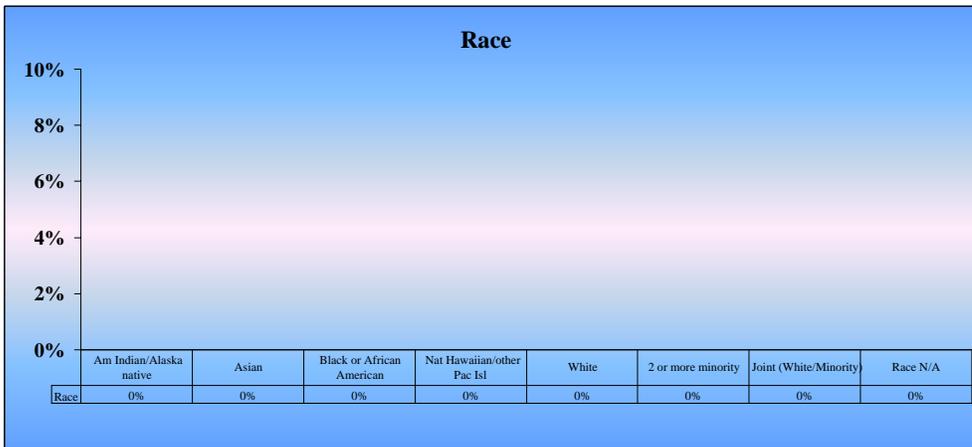
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



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	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%

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





Employment Information





Bank of New York Mellon



THE BANK OF NEW YORK MELLON
Bank of New York Mellon Overview

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

Description

In 2007, Mellon Bank completed its \$16.5 billion merger with Bank of New York. The resulting institution, Bank of New York Mellon, is a \$218 billion global asset management and securities servicing company. The merger was completed on July 2, 2007.

In the years preceding the merger, both BNY and Mellon effectively withdrew from both retail banking and mortgage lending activities. In September 1999, Mellon Financial Corporation sold its in-house mortgage affiliate, Mellon Mortgage Company. Mellon sold its retail banking operations to Citizens Financial Group in 2001, while BNY sold its retail business to JPMorgan Chase in 2006. In March 2007, BNY sold its mortgage lending arm to EverBank.

Bank of New York Mellon's primary business focus is now on trust and custody activities, with an emphasis on institutional securities processing. The bank does not extend home mortgage, small business or consumer credit to retail customers or to the public at large. The bank does, however, originate some retail loans to accommodate its private banking clientele.

No CRA information is reported about Bank of New York Mellon's Massachusetts activities. The most recent review, conducted in May 2007, preceded the finalization of the BNY/Mellon merger. Ratings are provided for reference only.

Principal Officers

President & CEO

Robert P. Kelly
 One Wall Street
 New York, NY 10286
 212-495-1784

CFO

Bruce W. Van Saun
 One Wall Street
 New York, NY 10286
 212-495-1784

Chief Compliance Officer

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

Employees

Number of Employees	19,000 ¹⁵⁵
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	68
Branches Within Boston PSMA	1
Number of ATMs	0
Number of Free-Standing ATMs	0

CRA Rating

Rating Agency	Federal Reserve Bank of New York
Most Recent Rating	2007
Overall Rating	OUTSTANDING ¹⁵⁶
Lending Test Rating	NOT ASSESSED
Investment Test Rating	NOT ASSESSED
Service Test Rating	NOT ASSESSED

¹⁵⁵ FDIC Institution Directory

¹⁵⁶ Based on most recent CRA Performance Evaluation by Federal Reserve Bank of New York published 2007.



Discussion

Overall Rating: OUTSTANDING¹⁵⁷

BNY's performance was evaluated using the FFIEC interagency procedures and guidelines for wholesale and limited purpose institutions. The evaluation covers BNY's activity from January 1, 2005 through December 31, 2006. As a result, the scope of the CRA evaluation is limited to: community development lending; the level and nature of qualified investments; and community development services.

No CRA information is available for BNY Mellon within the Boston MSA. The following data is provided for reference only.

Community Development Lending

The level of BNY's community development lending activities compared favorably with other similarly situated banks operating in the assessment area. BNY's community development lending totaled \$646 million. Of this, 95%, was originated since the prior CRA examination.

Lending activity was directed to financial intermediaries that provide loans and other services to community development organizations. In an effort to leverage its lending, BNY maintains ongoing relationships with its intermediary borrowers. These relationships facilitate investment and service activity as well as community development lending activity.

Most of the loans were extended to organizations that provide affordable housing, and were responsive to critical housing needs in the assessment area. In addition, some of the loans had flexible terms that resulted in reduced financing costs for borrowers.

Level and Nature of Qualified Investments

The level of BNY's qualified investment activities compared favorably with other similarly situated banks operating in the assessment area. BNY made \$292 million in qualified investments, of which \$174 million (60% of total qualified investments) was made

since the last examination. New investments included \$3 million in grants and donations to organizations providing community development activities throughout BNY's assessment area.

Many of the bank's qualified investments are complex, requiring considerable management attention and expertise. LIHTCs are the largest proportion of the investment dollars. These investments, which help meet the assessment area's critical need for affordable housing, are considered complex because of their highly technical accounting requirements.

Community Development Services

BNY provides community development services within its assessment area through board and committee memberships, the provision of technical assistance and development of new programs that respond to identified needs within distressed communities. Community development services increased, particularly in residential mortgage seminars/fairs and small business seminars, since the last examination.

Most of the community development services provided are ongoing activities requiring regular participation on boards, loan committees and advisory committees of local community development organizations. Participation in community development services includes BNY management at the highest levels. For example, the bank's president serves as a director on the boards of three community development organizations.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
Mellon Financial Center One Boston Place Boston, MA 02108		✓
<small>FSB: Full Service Branch</small>		

¹⁵⁷ Based on most recent CRA Performance Evaluation by Federal Reserve Bank of New York published 2007.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

Mellon originated five HMDA-reportable loans in 2006 in the Boston PMSA, and none in 2007. No data is available on Bank of New York Mellon's post-merger HMDA activity for 2007.¹⁵⁸

	2005	2006	2007
HMDA Applications Received	0	5	0
HMDA Loans Originated	0	5	0
Low-Income Applications Received	0	0	0
Low-Income Loans Originated	0	0	0

Small Business Loans

No 2007 HMDA-reportable small business loan data was available for Mellon Bank.¹⁵⁹

Loan Information By Census Tract

Please refer to the addendum The 2007 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

¹⁵⁸ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

¹⁵⁹ Ibid.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Reserve Bank of New York; May 21, 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

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

Mellon Financial Corporation Annual Report 2007.

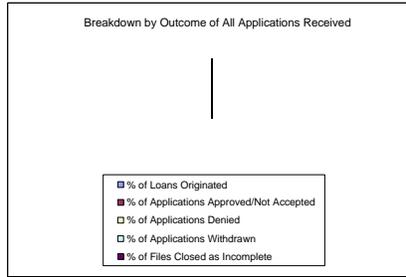
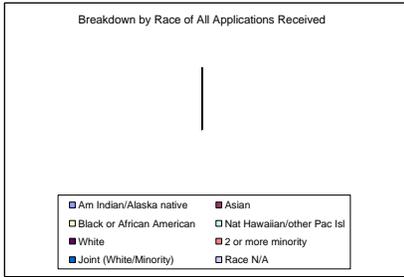
Bank of New York Mellon website:
<http://www.bnymellon.com/>

Mellon Trust of New England HMDA Mortgage Information

2007

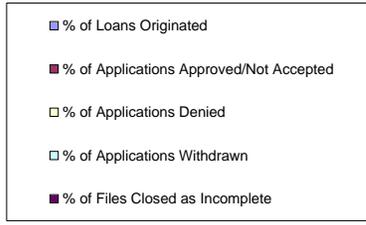
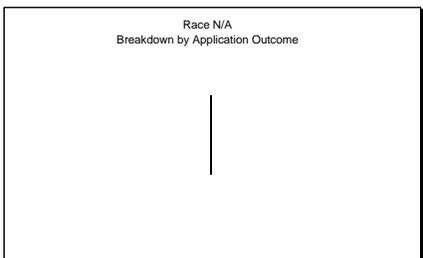
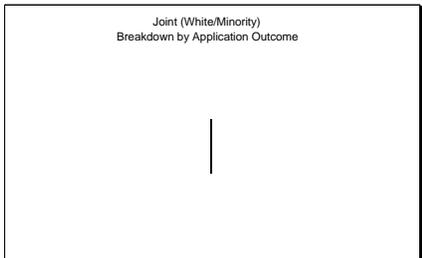
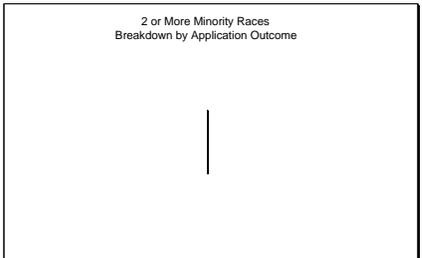
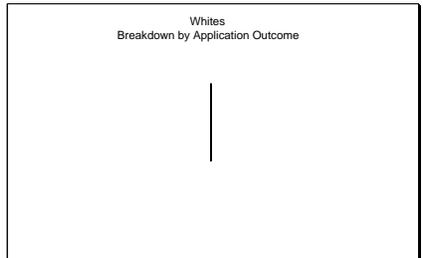
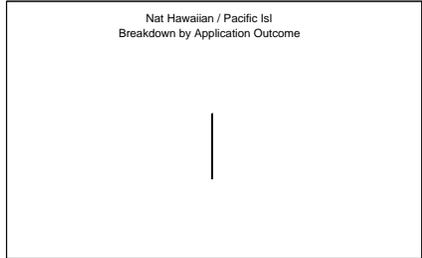
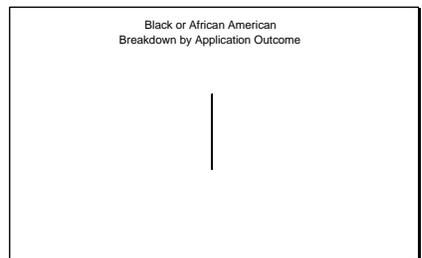
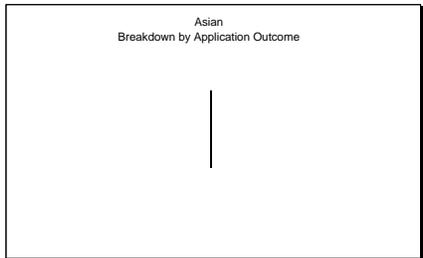
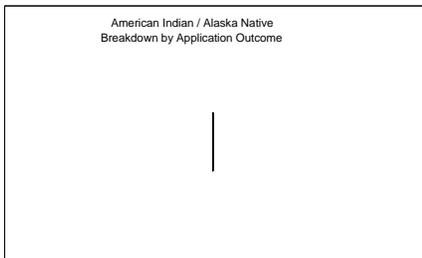
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of 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.



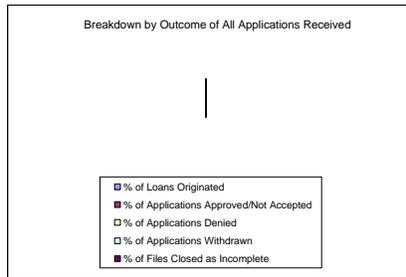
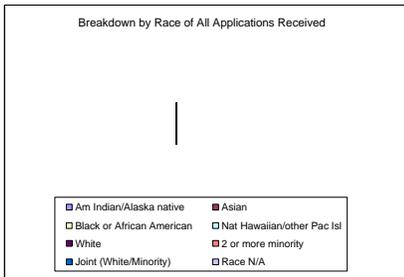
Mellon Trust of New England Low-Income Mortgage Information

Note: No Data Reported for the Boston/Quincy Region

2007

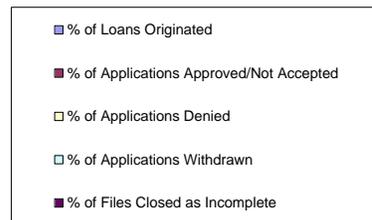
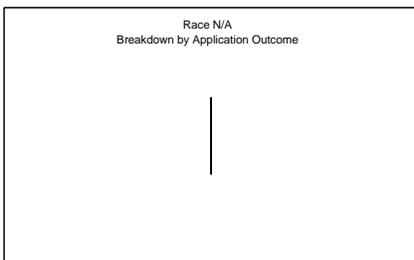
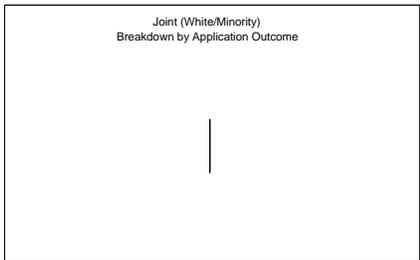
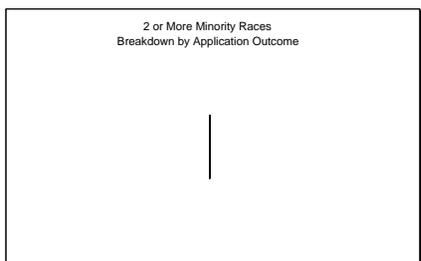
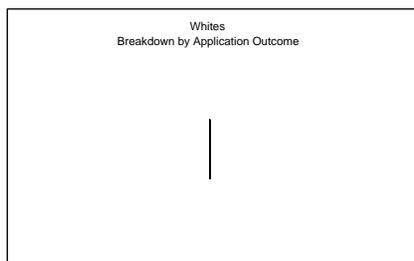
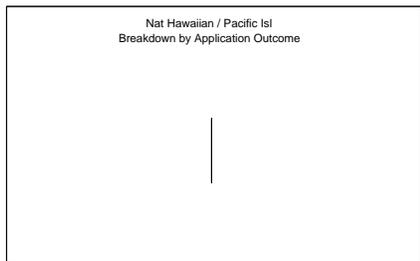
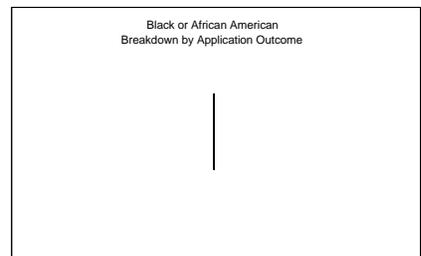
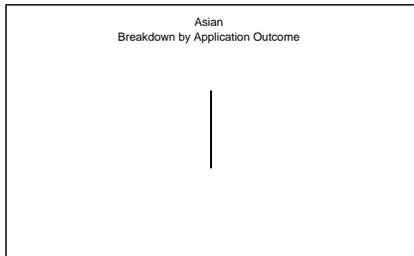
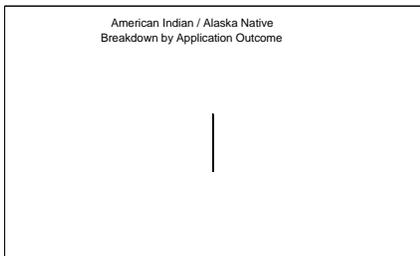
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of 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.



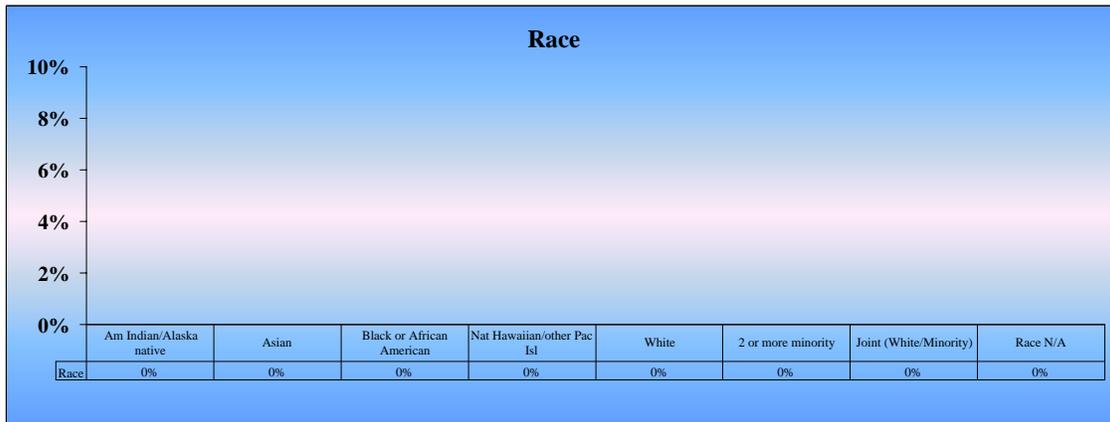
Compared against the MSA Aggregate Total

2007

Mellon Trust of New England 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	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%

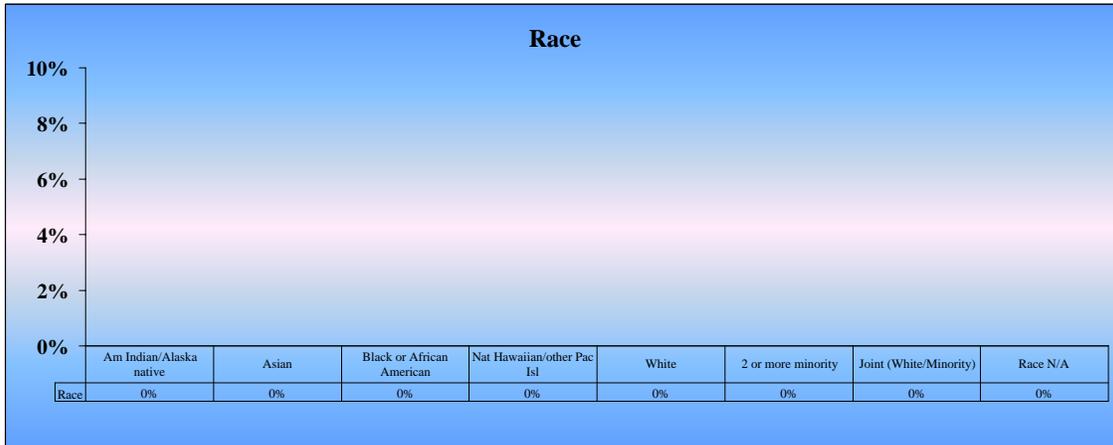
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Mellon Trust of New England Low-Income Mortgage Information

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

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





Employment Information

No data available





Mount Washington Co-Operative Bank



**Mt. Washington Co-Operative Bank
Overview**

Mt. Washington Bank
430 West Broadway
South Boston, MA 02127

Description

Mt. Washington Co-operative Bank (Mt. Washington Bank) is a \$515 million, mutually owned community bank headquartered in South Boston. In addition to its six full-service offices, the bank operates a loan center in South Boston.

The bank’s primary business focus is residential mortgage lending. At the end of 2007, 64.7% of the bank’s outstanding loans were secured by 1-4 family residential properties. This proportion has been declining steadily since 2002, while the proportion of loans secured by construction and land development (12.8%) and commercial real estate (18.2%) has risen.

Principal Officers

President & CEO

Edward J. Merritt
430 West Broadway
South Boston, MA 02127
(617) 268-0379

CFO

George M. Custodio
430 West Broadway
South Boston, MA 02127
(617) 268-0379

CRA Officer

Laura Dorfman
430 West Broadway
South Boston, MA 02127
(617) 268-0379

Employees

Number of Employees	113 ¹⁶⁰
Number of Employees in Massachusetts	113
Percentage of Women Employees	17%
Percentage of Minority Employees	4%

Branches

Number of Branches - Total	6
Branches Within Boston PSMA	6
Number of ATMs	7
Number of Free-Standing ATMs	1

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2007
Overall Rating	SATISFACTORY¹⁶¹
Lending Test Rating	SATISFACTORY
Community Development Rating	SATISFACTORY

¹⁶⁰ FDIC Institution Directory

¹⁶¹Based on most recent CRA Performance Evaluation by FDIC published 2007.



Discussion

Overall rating: SATISFACTORY¹⁶²

Mt. Washington Bank was evaluated under the FDIC's revised Intermediate Small Bank CRA procedures, which replace the Lending, Investment, and Service Tests with a Lending Test and Community Development Test.

Lending Test

**Lending Test Rating:
SATISFACTORY¹⁶³**

General Responsiveness to Credit Needs

Overall, based on the Mt. Washington Bank's asset size, resources, the credit needs of its customers, and the LTD ratios of similarly situated institutions, the Bank's net loan-to-deposit ratio is considered more than reasonable. The Bank's lending represents a reasonable dispersion within the AA and is considered satisfactory.

Mt. Washington Bank ranked 14th in market share within its assessment area in both 2005 and 2006, out of over 300 HMDA-reporting lenders. No other locally-based institution ranked higher, and the six banks and seven mortgage companies ranked higher are all significantly larger in asset size. In addition, Mt. Washington Bank is the only locally based institution in the top 50. This demonstrates that within its assessment area, Mt. Washington Bank is the number-one local lender.¹⁶⁴

Responsiveness to Low- and Moderate-Income Credit Needs

Mt. Washington Bank's market rank indicates that it has been very successful in meeting the home mortgage lending needs of low- and moderate-income residents of their assessment area.

The Bank's percentage of lending to low-income borrowers exceeded the aggregate's lending in both 2005 and in 2006. In 2005, the Bank originated 7.4% of its loans to low-income

borrowers, while the aggregate originated 3.2%. In 2006, the aggregate decreased to 2.2%; while the Bank's performance decreased to 3.3%, it still exceeded the aggregate market. The Bank extended 90 loans to moderate-income borrowers, representing 24.5% of total originations. The Bank's percentages in both 2005 and 2006 were higher than the aggregate.

In 2005, Mt. Washington Bank ranked 4th in market share to low-income individuals out of 326 lenders. Only Countrywide Home Loans, Bank of America, and Taylor, Bean & Whitaker ranked higher. In 2006, the Bank ranked 5th in market share to low-income individuals, out of 339 lenders. In the moderate-income borrower category, the Bank ranked 7th in 2005 and 6th in 2006. The only locally-based institution ranking higher was Citizens Bank of Massachusetts, a bank of much larger asset size.¹⁶⁵

In 2006, out of 339 lenders in the AA, the market rank reports show that the Bank ranked 10th for low-income census tract penetration and 33rd for moderate-income census tract penetration. The Bank made 4.9% of all home purchase loans in low-income tracts in 2006, which is comparable to the aggregate performance of 5.2%. The Bank made only 9.8% of all home purchase loans in the moderate-income tracts, compared to the aggregate market's 51.2%. In 2006, the only locally-based institution that ranked higher in terms of low- and moderate-income census tract penetration was Citizens Bank of Massachusetts.

In 2006, in South Boston only, the Bank ranked 2nd in lending within low-income tracts and 1st in lending within the moderate-income census tracts.¹⁶⁶

In November 2006, Mt. Washington Bank, along with five other banks, was recognized by Mayor Menino as a "First Choice Lender."¹⁶⁷

Community Development Test

**Community Development Test Rating:
SATISFACTORY¹⁶⁸**

¹⁶² Based on most recent CRA Performance Evaluation by FDIC published 2007.

¹⁶³ Ibid.

¹⁶⁴ Ibid.

¹⁶⁵ Ibid.

¹⁶⁶ Ibid.

¹⁶⁷ Mt. Washington Bank website.

¹⁶⁸ Based on most recent CRA Performance Evaluation by FDIC published 2007.



The community development test evaluates the Bank's community development loans, investments, and services. Mt. Washington Co-operative Bank's community development performance demonstrates adequate responsiveness to the community development needs of its assessment area.

Community Development Loans, Investments, & Grants

The Bank made a good level of community development loans. During the time period under FDIC review, the Bank extended 6 new community development loans totaling \$4.2 million. Two of these loans totaling \$2,500,000 were renewed during the period.

Mt. Washington Bank has demonstrated a good level of responsiveness to the assessment area's credit and economic development needs through its community development investments. The Bank's investment activity consists primarily of qualified grants and charitable contributions.

The purchase and construction of the bank's new branch in the moderate-income Codman Square neighborhood of Dorchester is considered a CRA qualified investment. The property, located at 305 Talbot Avenue, had been acquired by the City through foreclosure; the Bank's proposal to develop the property was chosen by the City of Boston's Public Facilities Commission in 2005. The site now houses the Bank's Codman Square Branch. In response to feedback from the community, the Branch includes a community meeting room. The purchase price of the site was approximately \$1 million, while the cost of construction was approximately \$2.6 million, for a total investment of approximately \$3.6 million.¹⁶⁹

The remainder of the Bank's investments consists of charitable contributions. In 2002, bank management established the Mt. Washington Charitable Foundation with an initial endowment of \$446,866. The bank donates 10% of annual profits to community organizations in South Boston and Dorchester. The Foundation focuses on programs involving education, youth, and the arts. In 2007, the bank made \$285,000 in donations, and was named among the top charitable givers in Massachusetts by *The Boston Business Journal*.¹⁷⁰

¹⁶⁹ Ibid.

¹⁷⁰ Mt. Washington Bank website.

In addition, the Bank sponsored its first annual 5K road race in South Boston in 2006, and raised \$50,000. This money was provided to the Foundation to help support the educational programs and scholarships for youth in the local communities. The second annual road race held in 2007 yielded \$75,000. The Foundation provides many scholarships; it is noteworthy that the Bank provides significant support of the educational needs within its assessment area.¹⁷¹

During the period under review, the Bank extended \$818,967 in charitable contributions through the Foundation. The Bank's contributions supported organizations that provide education, training, affordable housing, youth services, and health and human services for individuals in need.

Organizations that have benefited from the Foundation's contributions include:

- The Codman Square and The South Boston Neighborhood Development Corporations
- Codman Square Community Health Center
- South Boston Neighborhood House
- South Boston Community Health Center
- Project Place
- Dorchester YMCA

In September 2006, the South Boston Arts Association named Mt. Washington Bank as Arts partner of the Year in recognition of its funding and support.¹⁷²

Community Development Services

The CRA regulation defines a community development service as a service that is primarily for a community development purpose and is related to the provision of financial services. The Bank's services demonstrate a very good level of responsiveness to the community.

Mt. Washington Bank's officers and employees are involved with community organizations that address economic issues and affordable housing development. Through this involvement, the Bank's staff lends its technical expertise, experience, and judgment to these organizations. Staff involvement in these organizations has also allowed the Bank to identify credit needs in the

¹⁷¹ Based on most recent CRA Performance Evaluation by FDIC published 2007.

¹⁷² Mt. Washington Bank website.



community and bolster its community development lending activity.¹⁷³

In 2007, the Bank established its Community Teller Training Program. Through this innovative program, the Bank partnered with social service agencies and was able to train and subsequently hire individuals from the community. The program was designed to assist those looking for work, with particular emphasis on individuals who were transitioning from public assistance, mature older workers attempting to re-enter the workforce, and those who speak English as a second language. The Community Teller Training Program was offered for two weeks in 2007, and of the seven candidates who participated in the program, five were offered jobs with the Bank.¹⁷⁴

Senior officers, directors, and staff of the bank are involved in various community development programs and projects sponsored by organizations in the bank's assessment area. Among these organizations are:

- City of Boston Department of Neighborhood Development
- Fields Corner Community Development Corporation
- South Boston Neighborhood House
- South Boston Community Health Center
- Federated Dorchester Neighborhood Houses
- The Paraclete Foundation.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
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	✓	✓
515 Center Street Jamaica Plain, MA 02130	✓	✓
305 Talbot Avenue Dorchester, MA 02124	✓	✓

¹⁷³ Based on most recent CRA Performance Evaluation by FDIC published 2007.

¹⁷⁴ Ibid.

Caritas Carney Hospital ✓
Dorchester, MA

FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Mt. Washington Bank's HMDA lending increased dramatically in 2005, with the number of HMDA loans originated more than tripling. The bank's low-income loans increased four-fold.

Since then, lending levels have remained consistent, with HMDA lending rising slightly in 2006 and falling slightly in 2007, and low-income lending dipping in 2006 and rising again in 2007.¹⁷⁵

	2005	2006	2007
HMDA Applications Received	183	224	203
HMDA Loans Originated	169	213	176
Low-Income Applications Received	14	4	9
Low-Income Loans Originated	13	4	9

Small Business Loans

No 2007 HMDA-reportable small business loan data was available for Mount Washington Bank.¹⁷⁶

Loan Information by Census Tract

Please refer to the addendum The 2007 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

¹⁷⁵ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

¹⁷⁶ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; November 19, 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

FDIC Information Directory:
<http://www2.fdic.gov/idas/main.asp>

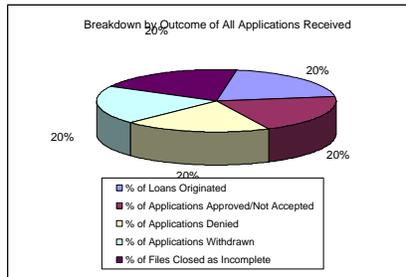
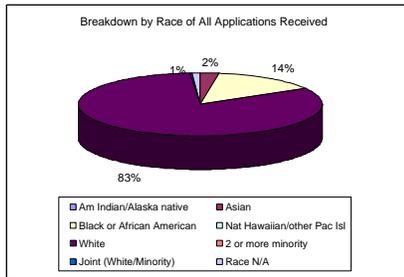
Mt. Washington Bank website:
<http://www.mtwashingtonbank.com/>

Mt. Washington Bank HMDA Mortgage Lending

2007

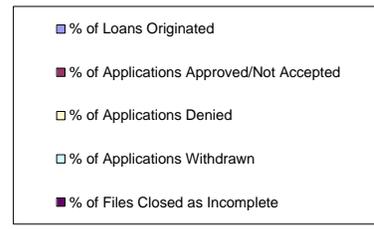
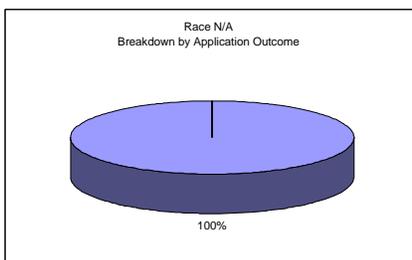
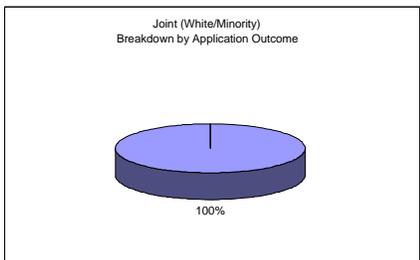
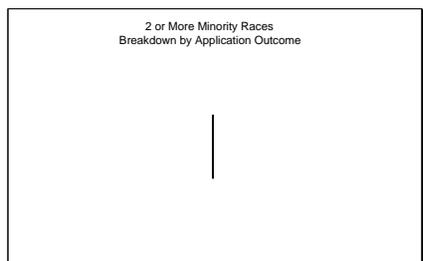
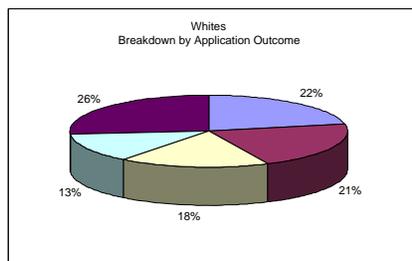
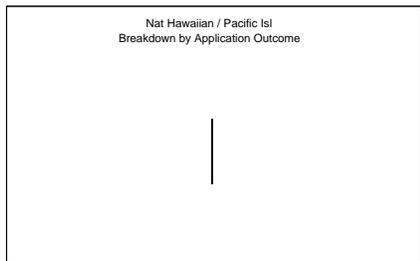
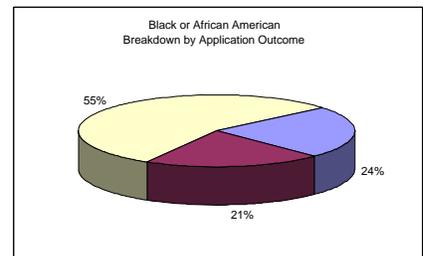
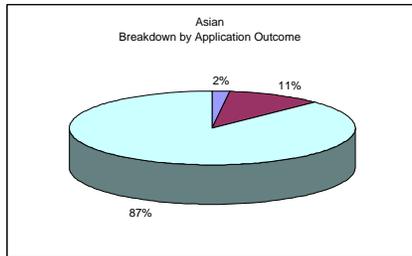
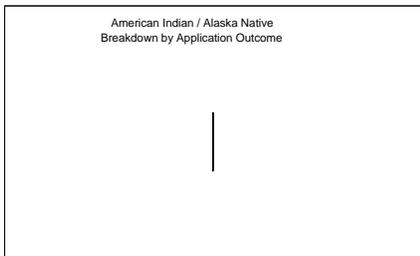
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	5	2%	2	1%	1	6%	0	0%	2	50%	0	0%
Black or African American	29	14%	25	14%	2	13%	2	33%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	166	82%	146	83%	13	81%	4	67%	2	50%	1	100%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	0%	1	1%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	1%	2	1%	0	0%	0	0%	0	0%	0	0%
Total	203	100%	176	100%	16	100%	6	100%	4	100%	1	100%

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.

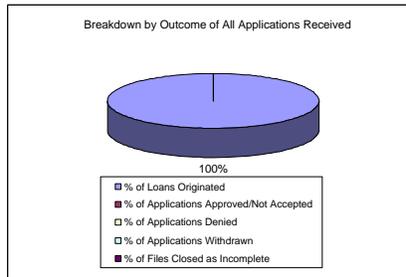
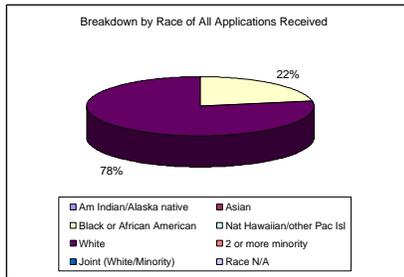


Mt Washington Bank Low-Income Mortgage Lending

2007

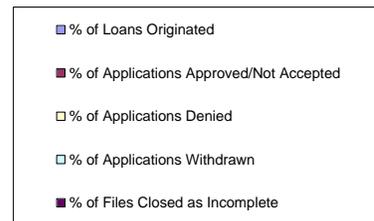
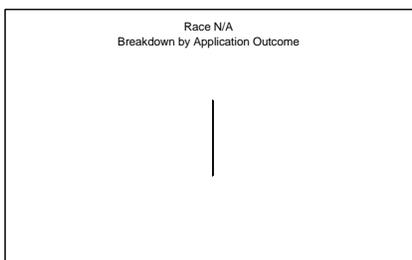
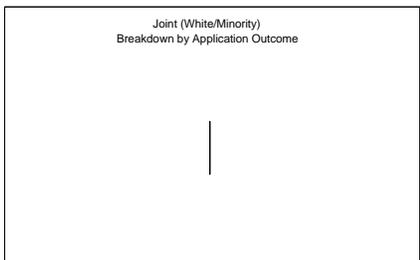
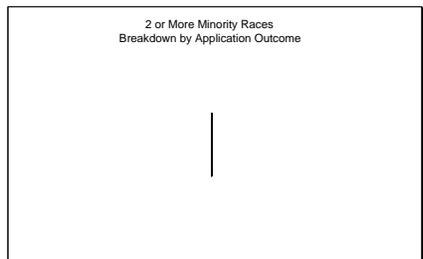
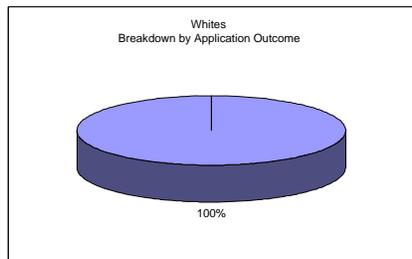
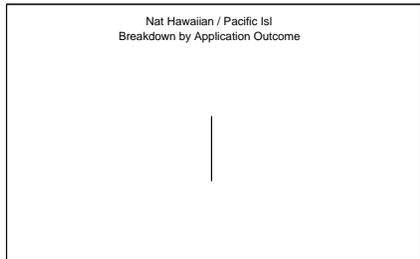
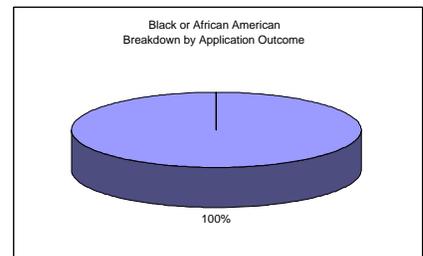
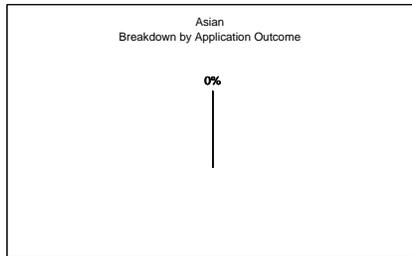
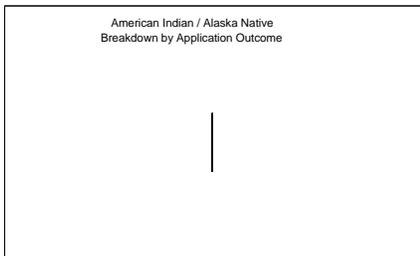
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of 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	22%	2	22%	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	78%	7	78%	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	9	100%	9	100%	0	0%	0	0%	0	0%	0	0%

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



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

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



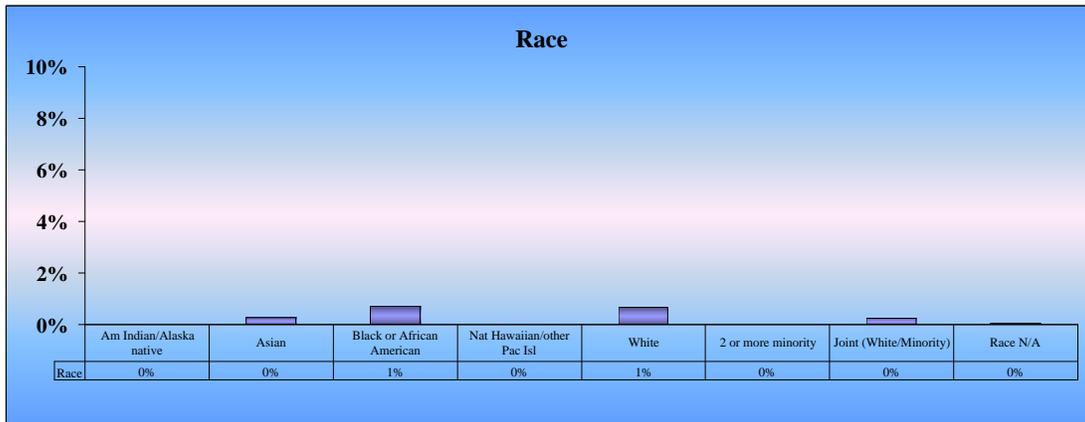
Compared against the MSA Aggregate Total

2007

Mt. Washington Bank HMDA Mortgage Lending

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	5	0%	2	0%	1	1%	0	0%	2	1%	0	0%
Black or African American	29	1%	25	1%	2	0%	2	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	166	1%	146	1%	13	1%	4	0%	2	0%	1	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	0%	1	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	0%	2	0%	0	0%	0	0%	0	0%	0	0%
Total	203	1%	176	1%	16	0%	6	0%	4	0%	1	0%

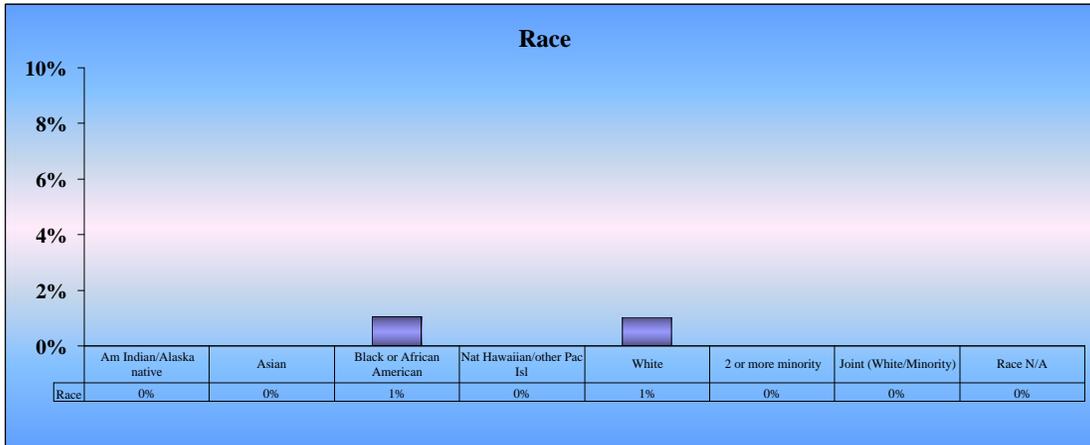
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Mt Washington Bank Low-Income Mortgage Lending

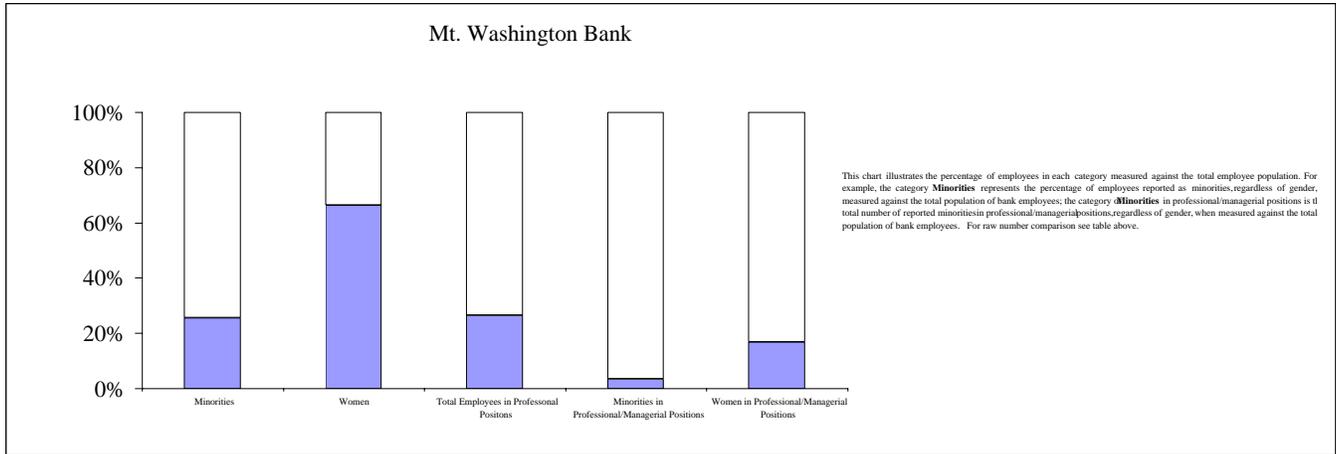
Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	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	7	1%	7	2%	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	9	1%	9	1%	0	0%	0	0%	0	0%	0	0%

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



Mt. Washington Bank Employment Numbers

	Number of Employees	Percent of Total Employees
Total	113	
Minorities	29	26%
Women	75	66%
Total Employees In Professional Positions	30	27%
Minorities in Professional or Managerial Positions	4	4%
Women in Professional or Managerial Positions	19	17%





OneUnited Bank



OneUnited Overview

OneUnited Bank
100 Franklin Street, 6th Floor
Boston, MA 02110

Description

OneUnited Bank is a minority-owned, commercially-chartered financial institution headquartered in Boston, Massachusetts. Its current asset size is \$653 million. OneUnited maintains three branches in Boston, two in Florida, and five in California.

The institution was created as the result of the consolidation of four minority-owned banks: Boston Bank of Commerce in Boston, Massachusetts; Peoples National Bank of Commerce in Miami, Florida; Founders National Bank in Los Angeles, California; and Family Savings Bank in Los Angeles, California.

OUB’s current business focus is primarily the origination of multifamily residential real estate loans, as well as lending to churches and religiously affiliated organizations in urban areas. The institution has experienced significant growth since the previous CRA evaluation in 2004, when total assets were approximately \$443 million, primarily through loan growth in California. Loan volume in Massachusetts and Florida has been extremely limited.

Principal Officers

CEO

Kevin Cohee
100 Franklin Street, 6th Floor
Boston, MA 02110
617-457-4491

President

Teri Williams
100 Franklin Street, 6th Floor
Boston, MA 02110
617-457-4491

CFO

John Trotter
100 Franklin Street, 6th Floor
Boston, MA 02110
617-457-4491

Chief Compliance Officer

Mary Schrader
100 Franklin Street, 6th Floor
Boston, MA 02110
617-457-4491

Employees

Number of Employees	98 ¹⁷⁷
Number of Employees in Boston	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches – Total	10
Branches Within Boston PSMA	3
Number of ATMs	0
Number of Free-Standing ATMs	0

CRA Rating for Massachusetts

Rating Agency	FDIC
Most Recent Rating	2007
Overall Rating	SATISFACTORY ¹⁷⁸
Lending Test Rating	SATISFACTORY
Community Investment	SATISFACTORY

¹⁷⁷Consolidated Reports of Condition and Income for A Bank With Domestic Offices Only - FFIEC 041,” FFIEC, December 31, 2006.

¹⁷⁸ Based on most recent CRA Performance Evaluation by FDIC published 2007.



Discussion

Based on the bank's asset size, their CRA performance was evaluated using the Interagency Intermediate Small Institution Examination Procedures, which consist of a Lending Test and a Community Development Test.

Overall rating: SATISFACTORY¹⁷⁹

Lending Test

Lending Test Rating in Massachusetts: SATISFACTORY¹⁸⁰

General Responsiveness to Credit Needs

OneUnited Bank had very little HMDA reportable activity in the Massachusetts assessment area. The vast majority of the bank's lending occurs in California.

The bank's low but meaningful level in Massachusetts is deemed passable.¹⁸¹

The Bank's loan-to-deposit ratio in Massachusetts was 91 percent as of December 31, 2006, and is considered to be reasonable.¹⁸² Between 2006 and 2007, the bank's overall loan-to-deposit ratio nationwide dropped from 76.4% to 65.5%.¹⁸³

A review of the 2005 and 2006 HMDA data revealed a total of seven loans in the Massachusetts assessment area. The low number alone indicates that the Bank has not been very successful at extending residential mortgage credit within the assessment area.¹⁸⁴

Responsiveness to Low- and Moderate-Income Credit Needs

The bank's low but meaningful and targeted level of lending in Massachusetts is marginally adequate.¹⁸⁵

OneUnited only originated a total of seven loans in the Massachusetts assessment area in 2005 and 2006, with a penetration in only seven of all 176 census tracts in the assessment area.

All seven Massachusetts HMDA loans originated in 2005-2006 were secured by properties in low- or moderate-income census tracts, and four of the loans were multifamilies. All four provide affordable housing. These loans are presumably helping meet the needs of low- and moderate-income residents. This fact, as well as the geographic distribution, is noteworthy and was given positive consideration. However, the lending performance is diminished by the low number of originations.

Community Development Test

Community Development Test Rating in Massachusetts: SATISFACTORY¹⁸⁶

The bank's rating for this test was most heavily influenced by the Bank's strong performance in community development lending. The level of qualified investments is less than satisfactory, but the level of community development services is considered reasonable.

Lending

Four multifamily loans, totaling \$3,608,750, were originated by the bank in the Massachusetts assessment area and are considered qualified community development loans. The bank also originated four loans, totaling \$10,347,000, to religious organizations and other entities for community services and revitalization and stabilization purposes.

The total number and dollar amount of these community development loans are considered very good based on the Bank's size and resources.

Investments

A review of the Bank's qualified investments revealed an adequate level of charitable contributions in Massachusetts (\$45,600 over the period reviewed), and one qualified deposit in a Boston-based CDFI. However, there were no

¹⁷⁹ Based on most recent CRA Performance Evaluation by FDIC published 2007.

¹⁸⁰ Ibid.

¹⁸¹ Ibid.

¹⁸² Ibid.

¹⁸³ FDIC Institution Directory.

¹⁸⁴ Based on most recent CRA Performance Evaluation by FDIC published 2007.

¹⁸⁵ Ibid.

¹⁸⁶ Ibid.



equity investments or other qualified investments within the assessment area.

Given the size of the institution and the fact that OneUnited Bank is chartered in Massachusetts, the volume of qualified investments within the assessment area is considered less than satisfactory.¹⁸⁷

Service

OneUnited Bank’s service network in Massachusetts is minimal. All three Boston offices are located in low-income census tracts; however, neither location offers extended weekday or weekend hours. In addition, the downtown Boston location does not have the capability to process cash transactions for customers, and neither location has an automated teller machine (ATM).¹⁸⁸

The bank is active in providing and supporting financial literacy initiatives. In Massachusetts, the Bank typically makes 2-3 financial literacy presentations per year. The activities of individual officers demonstrate support of various community development activities in the area.¹⁸⁹

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
100 Franklin Street Boston, MA 02110		✓
648 Warren Street Dorchester, MA 02121		✓
2343 Washington Street Roxbury, MA 02119		✓

FSB: Full Service Branch

The bank’s Warren Street branch opened in June 2007, and marks the bank’s first de-novo branch opening.

OneUnited owns no proprietary ATMs.

Year-Over-Year at a Glance

HMDA And Low-Income Loans

OneUnited Bank has not originated any low-income loans in Boston since 1998. During years 1999-2003, OneUnited Bank made only one HMDA loan.

Between 2005 and 2007, OneUnited originated no low-income loans, and only one HMDA loan.¹⁹⁰

	2005	2006	2007
HMDA Applications Received	0	3	0
HMDA Loans Originated	0	1	0
Low-Income Applications Received	0	0	0
Low-Income Loans Originated	0	0	0

Small Business Loans

No 2007 HMDA-reportable small business loan data was available for OneUnited Bank.¹⁹¹

Loan Information by Census Tract

Please refer to the addendum The 2007 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

¹⁸⁷ Ibid.

¹⁸⁸ Ibid.

¹⁸⁹ Ibid.

¹⁹⁰ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System, 2007.

¹⁹¹ Ibid.



Source Documents

Community Reinvestment Evaluation, Federal Deposit Insurance Corporation; April 3, 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

”Consolidated Reports of Condition and Income for A Bank With Domestic Offices Only - FFIEC 041,” FFIEC, December 31, 2007.

Massachusetts Division of Banks, Summary Information for State Chartered Banks and Credit Unions:

<http://db.state.ma.us/dob/in-choose.asp>

OneUnited website:

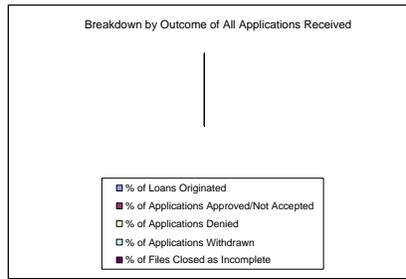
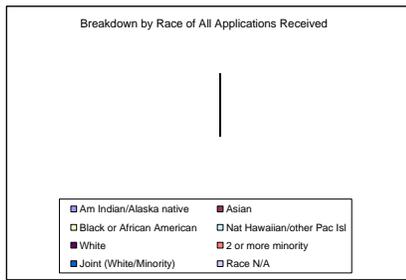
<http://www.oneunited.com/>

OneUnited Bank HMDA Mortgage Lending

2007

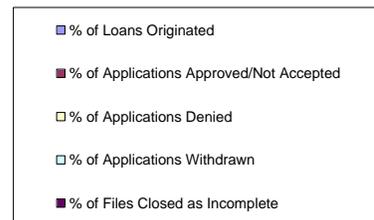
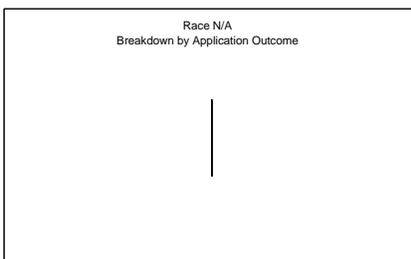
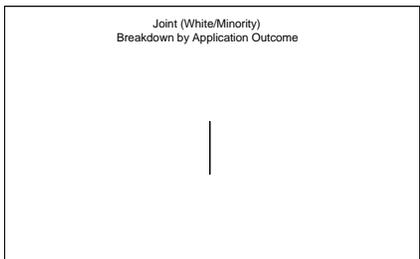
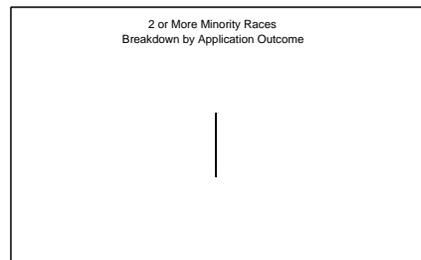
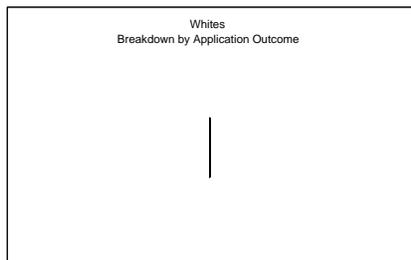
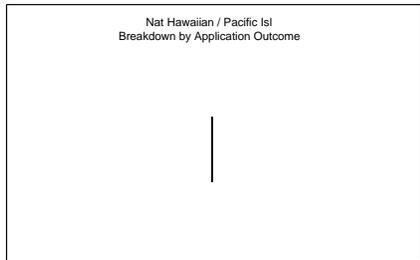
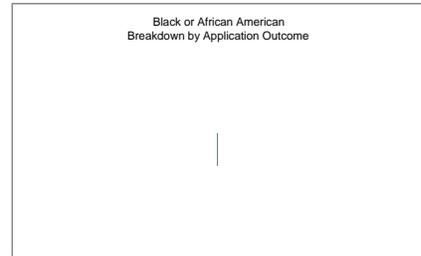
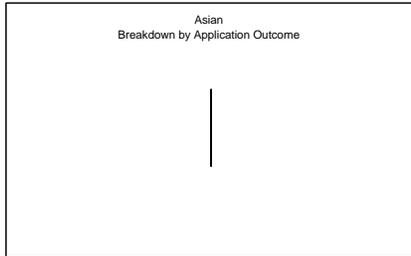
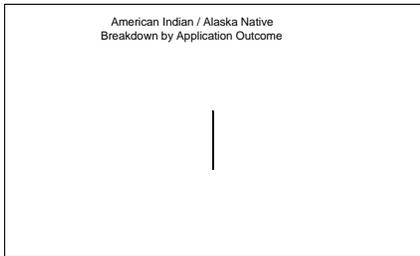
Race	% of Total				% of Applications			% of Applications			% of Files Closed	
	Applications Received	Applications Received	Loans Originated	% of Loans Originated	Approved/Not Accepted	Approved/Not Accepted	Denied	Applications Denied	Applications Denied	Applications Withdrawn	Applications Withdrawn	Files 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.



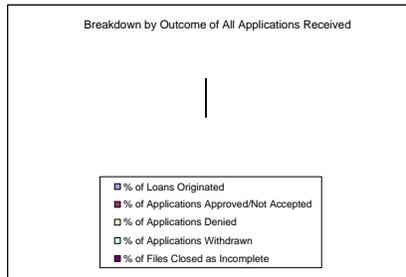
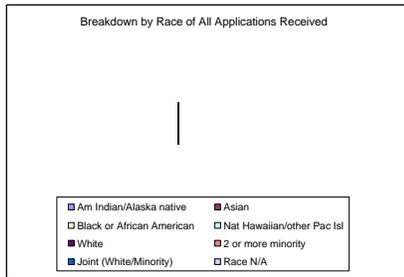
OneUnited Bank Low-Income Mortgage Lending

Note: No Data Reported For "Less Than 50% OF MSA/MD Median"

2007

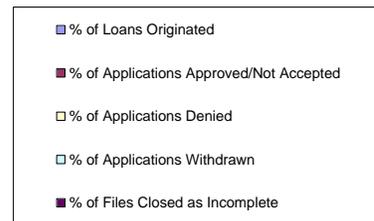
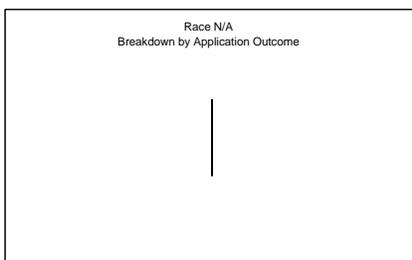
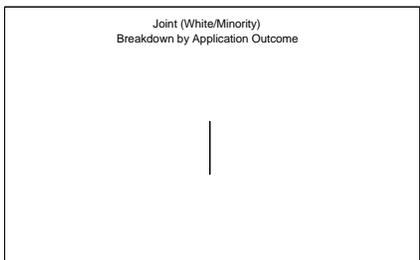
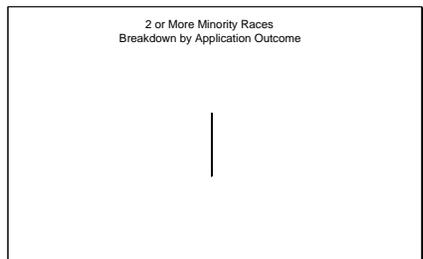
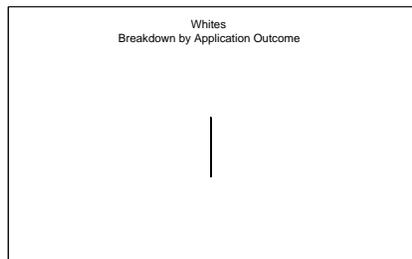
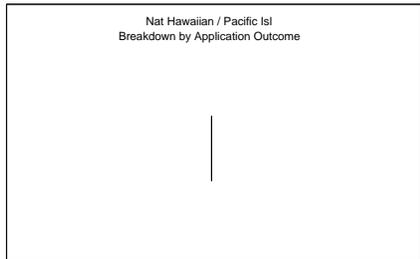
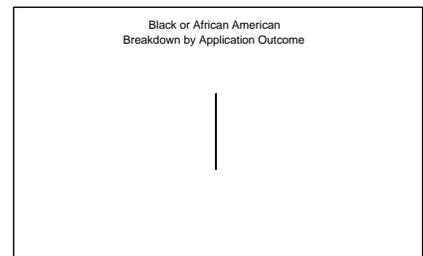
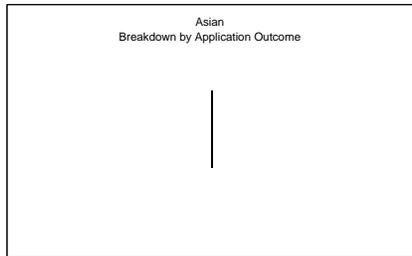
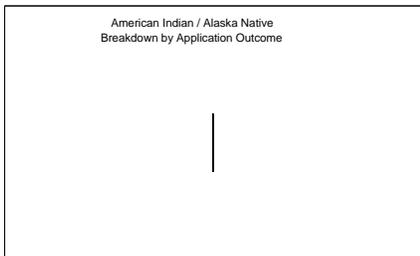
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of 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.



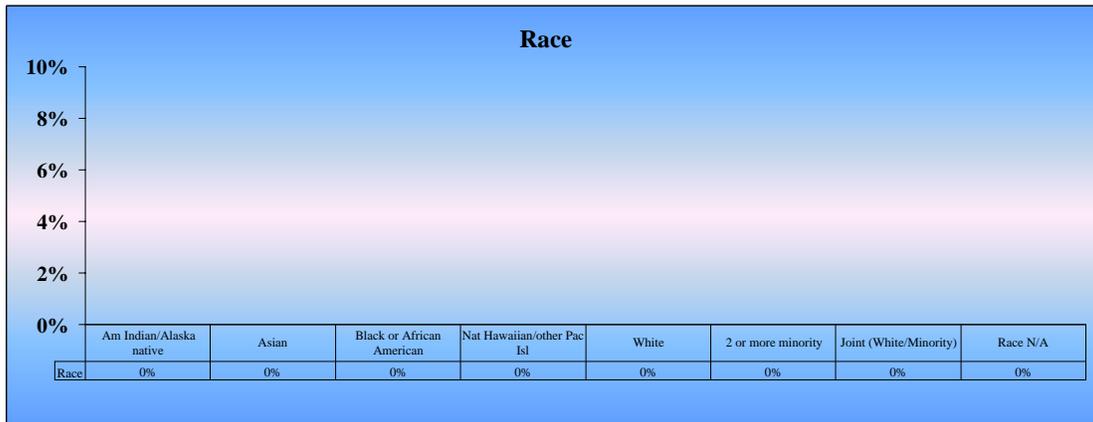
Compared against the MSA Aggregate Total

2007

OneUnited Bank HMDA Mortgage Lending

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

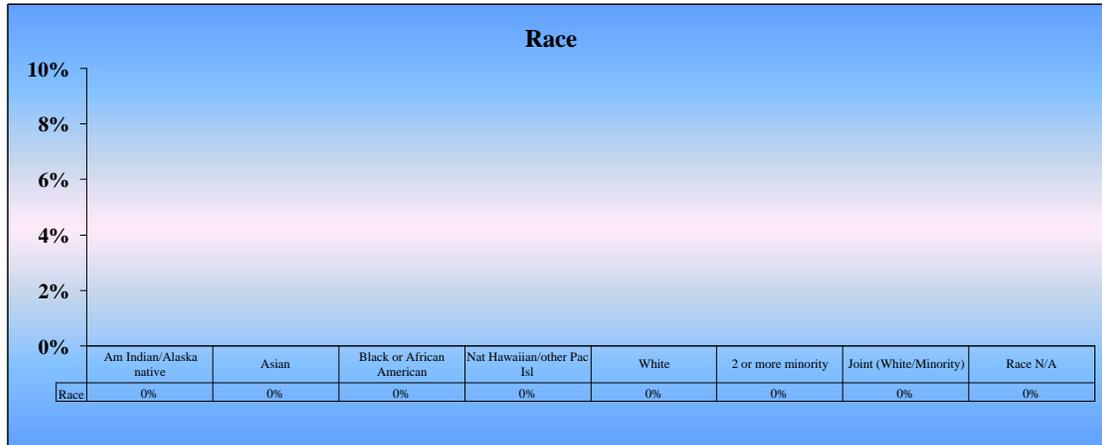
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



OneUnited Bank Low-Income Mortgage Lending

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

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





Employment Information



Sovereign Bank



Sovereign Bank Overview

Sovereign Bank
 840 Penn Avenue
 Wyomissing, PA 19610

Description

Sovereign Bank is an \$84.7 billion federally chartered, stock savings bank headquartered in Wyomissing, Pennsylvania. Sovereign is a wholly owned subsidiary of Sovereign Bancorp, Inc., a publicly traded, unitary thrift holding company located in Philadelphia, Pennsylvania.

Sovereign Bank is the 19th largest banking institution in the United States. The bank has 750 community banking offices, over 2,300 ATMs, and approximately 12,000 employees with principal markets in the northeast United States. Sovereign’s primary business consists of attracting deposits from its network of community banking offices, located throughout and originating commercial, consumer, and residential mortgage loans in those communities.

Sovereign Bank has offices in Pennsylvania, New Jersey, New York, New Hampshire, Massachusetts, Connecticut, Rhode Island, and Maryland.

Sovereign has acquired 28 financial institutions, branch networks, and related businesses since 1990. Its acquisitions strategy is focused on creating what it describes as a “super-community bank.”

In 2004, Sovereign completed the acquisition of Seacoast, a commercial bank holding company headquartered in New Bedford, Massachusetts, and the acquisition of First Essex, headquartered in Andover, Massachusetts. The acquisitions resulted in a strong Sovereign presence in Massachusetts. The Seacoast acquisition added 67 banking offices throughout Southeastern Massachusetts.

Principal Officers

President & CEO, Sovereign Bancorp

Joseph P. Campanelli
 1500 Market Street
 Philadelphia, PA 19102
 267-256-8601

CFO

Kirk W. Walters
 1500 Market Street
 Philadelphia, PA 19102
 267-256-8601

Chief Compliance Officer

M. Robert Rose
 1500 Market Street
 Philadelphia, PA 19102
 267-256-8601

Employees

Number of Employees	11,976
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	750
Branches in Boston	35
Number of ATMs	2,300
Number of Free-Standing ATMs	1,550

CRA Rating

Rating Agency	OTS
Most Recent Rating	2005
Overall Rating	OUTSTANDING¹⁹²
Lending Test Rating	OUTSTANDING
Investment Test Rating	OUTSTANDING
Service Test Rating	OUTSTANDING

¹⁹² Based on most recent CRA Performance Evaluation by OTS, published 2005.



Discussion

Overall rating: OUTSTANDING¹⁹³

Lending Test

**Lending Test Rating:
OUTSTANDING¹⁹⁴**

General Responsiveness to Credit Needs

Sovereign Bank originated and purchased more than 78,000 HMDA-reportable loans totaling \$11.4 billion in the overall assessment area during the CRA review period. Overall growth in nationwide market volume against significant market trends reflects exceptional performance. The concentration of HMDA and small business loans in the combined assessment area was strong.

The institution's overall market share performance reflects a strong commitment to serving all segments of the community. The institution ranked 16th out of nearly two thousand lenders. The top fifteen were all nationwide mortgage lenders.

Responsiveness to Low- and Moderate-Income Credit Needs

The distribution of Sovereign's loans to borrowers of different income levels in the combined assessment area was very strong, compared to both aggregate lending data and assessment-area census data.

Sovereign's lending to low- and moderate-income borrowers in 2004 significantly exceeded that reported by aggregate HMDA reporters in 2004, by both number of loans and dollar volume of lending.

Sovereign provided a broad array of mortgage loan products that included flexible underwriting criteria to promote homeownership amongst low- and moderate-income populations. These loans indicate the strong response to community credit needs provided by Sovereign's flexible mortgage programs.

Leadership in Community-Development Loans

Sovereign made a significant impact addressing the credit needs of communities and individuals through its community development lending activities, substantially exceeding the standard for satisfactory performance in this criteria.

In its Boston-Cambridge-Quincy MSA, Sovereign originated more than \$49 million in community development loans. These provided affordable housing for low- and moderate-income families, food services and shelters for distressed populations, centers for rehabilitation and substance abuse services, and economic development funds to revitalize and stabilize lower income communities.

The bank's larger CDLs in Boston include:

- MHPF- Edgewater: \$1.6 million loan. Housing units for low- and moderate-income seniors.
- Reserve Channel Condominiums: \$4.9 million loan. 26 condo units sold under HUD affordability standards.
- Julie's Family Learning Program: \$1.2 million line of credit. Organization provides community services for low- and moderate-income populations.
- Diamond Windows and Doors Dorchester: \$2.2 million loan. Funding plant improvements to foster job retention for minority-owned manufacturing business.
- Boys and Girls Club of Boston: \$7.0 million working capital line of credit. Serving disadvantaged and low-income youth.
- East Boston Neighborhood Health Center: \$2.0 million loan. Provides social services for low-income seniors.

During 2006, Sovereign Bank provided \$3.2 billion in CRA qualified lending and investments.¹⁹⁵

Investment Test

**Investment Test Rating:
OUTSTANDING¹⁹⁶**

¹⁹³ Based on most recent CRA Performance Evaluation by OTS published 2005.

¹⁹⁴ Ibid.

¹⁹⁵ Sovereign Bank Annual Report 2006.

¹⁹⁶ Based on most recent CRA Performance Evaluation by OTS published 2005.



Sovereign made a significant impact with its community development investment and contributions activities, exceeding the standard for satisfactory performance in this criterion.

Sovereign was a major supporter of low-income housing development, through participation in LIHTC equity investments. The institution's community development investments also supported revitalization and stabilization of distressed communities, special needs populations, and a broad range of other community-development activities.

During the CRA review period, Sovereign provided 186 grants to community development organizations in the Boston-Cambridge-Quincy MSA, for more than \$1 million.¹⁹⁷ Major community investments within the City of Boston include:

- New Market Tax Credits (\$9.7 million to create new office space and new jobs.)
- South End Credit Union (Purchased a \$50,000 COD in this community development credit union serving lower-income populations.)
- Massachusetts Affordable Housing Alliance (Affordable housing and economic development)
- Urban Edge (Affordable housing and economic development)
- Habitat for Humanity (Homeownership renovation program)
- ACCION (Economic development)
- ACORN (Fair housing)
- Fair Housing Center of Greater Boston (Equality-in-housing opportunities)
- Fenway CDC (Economic development)
- MACDC (Economic development)
- Massachusetts Housing Partnership (Affordable housing and community development)
- Project Place (Job training program)
- Citizens Housing and Planning Association (Affordable housing creation)
- Consumer Credit Counseling of Southern New England (Credit counseling for first-time homebuyers and distressed debtors)
- Metropolitan Boston Housing Partnership (Homeownership programs)
- Chelsea Neighborhood Housing Services (Affordable housing initiatives)

- Neighborhood of Economic Development ("On the Border" program)
- Mattapan CDC (Creation of learning center for business development)
- Women's Institute for Housing & Economic Development (Community housing initiative)

During 2007, Sovereign Bank provided \$3.2 billion in community-development lending and investment, focused on assisting first time homebuyers, creating affordable rental housing, and helping small businesses growth. In conjunction with these programs, the Sovereign Bank Foundation and the Sovereign Endowment Fund gave over \$6.5 million in grants to organizations that promote community and economic development, youth and education, arts and culture, as well as health and human services.¹⁹⁸

Service Test

Service Test Rating: OUTSTANDING¹⁹⁹

Retail Services

The following chart shows the branch distribution in the Boston-Cambridge-Quincy MSA by geography, as of 2005.

Branch Distribution by Geography		
Geography	Number	Percentage
Low	16	9.2%
Moderate	28	16.1%
Middle	77	44.3%
Upper	53	30.5%
Total	174	100%

This assessment area has 22 percent of total institution branch offices.

Community-Development Services

Sovereign was a leader in providing technical and financial assistance to community development organizations.

¹⁹⁷ Ibid.

¹⁹⁸ Sovereign Bank Annual Report 2007

¹⁹⁹ Based on most recent CRA Performance Evaluation by OTS published 2005.



Sovereign employees contributed more than 80,000 hours of time in volunteer community service to almost 1,000 agencies and organizations during the review period. A significant proportion of this time was devoted to community development organizations, transitional housing and shelters for homeless and disabled populations, economic and community development projects, first-time home buyer seminars, financial literacy and mortgage education activities, and small business assistance programs.

The institution promoted and administered Family Savings Account and Individual Development Account programs. The programs provide matching funds from community development organizations.

Branch Information

Branch locations in the Boston PMSA:

Location	ATM	FSB
1 Beacon Street Boston, MA 02108	✓	✓
1 Federal Street Boston, MA 02110	✓	✓
100 Oliver Street Boston, MA 02110	✓	✓
1228 Boylston Street Chestnut Hill, MA 02467	✓	✓
125 Causeway Street Boston, MA 02114	✓	✓
125 Summer Street Boston, MA 02110	✓	✓
1442 Dorchester Avenue Dorchester, MA 02122	✓	✓
148 Everett Avenue Chelsea, MA 02150	✓	✓
1617 Blue Hill Avenue Mattapan, MA 02126	✓	✓
1850 Centre Street West Roxbury, MA 02132	✓	✓
2 Meridian Street East Boston, MA 02128	✓	✓
2 Morrissey Boulevard Dorchester, MA 02125	✓	✓
2 South Station Concourse Boston, MA 02210	✓	✓
200 Seaport Boulevard Boston, MA 02210	✓	✓
279 Massachusetts Avenue Boston, MA 02115	✓	✓
287 Hanover Street Boston, MA 02113	✓	✓
30 Winter Street Boston, MA 02108	✓	✓
3060 Washington Street	✓	✓

Boston, MA 02119	✓	✓
330 Broadway Revere, MA 02151	✓	✓
330 Martin Luther King Boulevard, Suite 45 Roxbury, MA 02119	✓	✓
43 Kneeland Street Boston, MA 02111	✓	✓
437 Rutherford Avenue Boston, MA 02129	✓	✓
474 West Broadway South Boston, MA 02127	✓	✓
521 Tremont Street Boston, MA 02116	✓	✓
552 Commonwealth Ave. Boston, MA 02215	✓	✓
575 Boylston Street Boston, MA 02116	✓	✓
585 Columbia Road Dorchester, MA 02125	✓	✓
6 Francis Street Boston, MA 02115	✓	✓
61 Arlington Street Boston, MA 02116	✓	✓
61 Harrison Avenue Boston, MA 02111	✓	✓
67 Beacon Street Boston, MA 02108	✓	✓
75 State Street Boston, MA 02109	✓	✓
780 Gallivan Boulevard Dorchester, MA 02122	✓	✓
800 Boylston Street Boston, MA 02199	✓	✓
892 River Street Boston, MA 02136	✓	✓
1 Ashburton Place Boston, MA 02106	✓	✓
1 Seaport Lane Boston, MA 02210	✓	✓
1 Union Street Boston, MA 02109	✓	✓
100 Huntington Avenue Boston, MA 02116	✓	✓
1010 Rever Beach Parkway Chelsea, MA 02150	✓	✓
111 Huntington Avenue Boston, MA 02199	✓	✓
1249 Boylston Street Boston, MA 02215	✓	✓
160 Federal Street Boston, MA 02110	✓	✓
191 Cambridge Street Boston, MA 02114	✓	✓
1921-1943 Centre Street West Roxbury, MA 02132	✓	✓
2 Center Plaza Boston, MA 02108	✓	✓
2 Seaport Lane Boston, MA 02210	✓	✓
200 Clarendon Street	✓	✓



Boston, MA 02117		942A Hyde Park Avenue	✓
200 Seaport Boulevard	✓	Hyde Park, MA 02136	
Boston, MA 02210		Central Wharf	✓
210 Border Street	✓	Boston, MA 02110	
East Boston, MA 02128		Logan Airport - Customs	✓
218 Hanover Street	✓	Exit	
Boston, MA 02113		1 Harborside Drive	
240 Newbury Street	✓	East Boston, MA 02128	
Boston, MA 02116		Logan Airport - Terminal A	✓
250 Washington Street	✓	One Harbor Drive	
Boston, MA 02109		East Boston, MA 02128	
264 Trapelo Road	✓	Logan Airport - Terminal B	✓
Belmont, MA 02478		1 Harborside Drive	
27 Beacon Street	✓	East Boston, MA 02128	
Boston, MA 02108		Logan Airport - Terminal B	✓
324 Broadway	✓	American Airlines	
Chelsea, MA 02150		1 Harborside Drive	
333 Washington Street	✓	East Boston, MA 02128	
Boston, MA 02111		Logan Airport - Terminal	✓
339 Squire Road	✓	C-4 Pier B	
Revere, MA 02151		1 Harborside Drive	
350 Longwood Avenue	✓	East Boston, MA 02128	
Boston, MA 02215		Logan Airport - Terminal	✓
400 Tremont Street	✓	C-5 Pier	
Boston, MA 02116		1 Harborside Drive	
423 West Broadway	✓	East Boston, MA 02128	
South Boston, MA 02127		Logan Airport - Terminal E	✓
467 Centre Street	✓	1 Harborside Drive	
Jamaica Plain, MA 02130		East Boston, MA 02128	
468 Blue Hill Avenue	✓	Logan Airport	✓
Dorchester, MA 02121		US Airways	
539 Tremont Street	✓	1 Harborside Drive	
Boston, MA 02116		East Boston, MA 02128	
55 Summer Street	✓	Logan Airport	✓
Boston, MA 02110		One Harbor Drive	
566 Columbus Avenue	✓	East Boston, MA 02128	
Boston, MA 02115		Logan Airport	✓
587 Boylston Street	✓	Terminal A 7	
Boston, MA 02116		One Harbor Drive	
600 Washington Street	✓	East Boston, MA 02128	
Boston, MA 02111		FSB: Full Service Branch	
631 Washington Street	✓		
Boston, MA 02111			
647 VFW Parkway	✓		
West Roxbury, MA 02467			
655 Centre Street	✓		
Jamaica Plain, MA 02130			
703 Gallivan Boulevard	✓		
Dorchester, MA 02124			
715 Morrissey Boulevard	✓		
Dorchester, MA 02122			
769 Washington Street	✓		
Boston, MA 02111			
778 Dudley Street	✓		
Dorchester, MA 02124			
800 Boylston Street	✓		
Boston, MA 02115			
850 Harrison Avenue	✓		
Boston, MA 02118			
900 Commonwealth Ave.	✓		
Boston, MA 02215			



Year-Over-Year at a Glance

HMDA And Low-Income Loans

Sovereign Bank's HMDA lending remained consistent from 2004-2005, though its low-income lending decreased significantly: applications dropped by 30% and originations by 23%. In 2006, the bank's HMDA applications and originations fell slightly, and its low-income lending remained the same.

In 2007, the bank's HMDA lending and low-income lending both increased substantially.²⁰⁰

	2005	2006	2007
HMDA Applications Received	963	839	1015
HMDA Loans Originated	716	664	778
Low-Income Applications Received	43	43	62
Low-Income Loans Originated	31	31	45

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			
	2005	2006	2007
Low	3.1%	3.0%	2.7%
Moderate	2.2%	2.5%	1.9%
Middle	2.1%	1.0%	0.9%
Upper	2.2%	1.3%	1.7%
Total	2.3%	1.7%	1.6%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2005	2006	2007
Low	11.4%	14.4%	11.7%
Moderate	8.0%	10.9%	8.9%
Middle	6.4%	4.3%	5.4%
Upper	6.6%	5.3%	7.0%
Total	8.0%	7.7%	7.6%

Please refer to the addendum [The 2007 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans](#) for details on small business loans. The small business loan activity for Sovereign Bank in the year 2007 is also compared to the 2007 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 2007 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 [The 2007 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

²⁰⁰ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of Thrift Supervision; March 11, 2005.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Sovereign Bank Annual Report 2007.

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

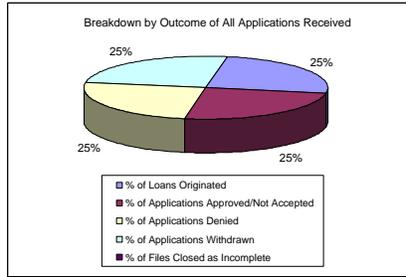
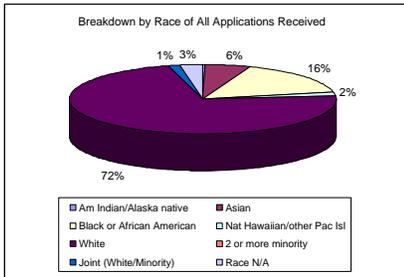
Sovereign Bank website
<http://www.sovereignbank.com/>

Sovereign Bank HMDA Mortgage Information

2007

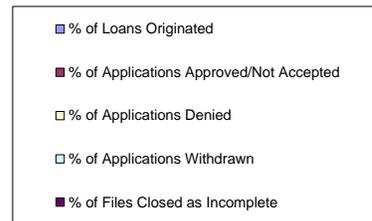
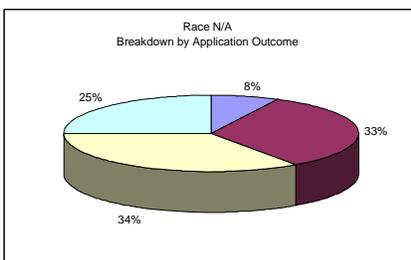
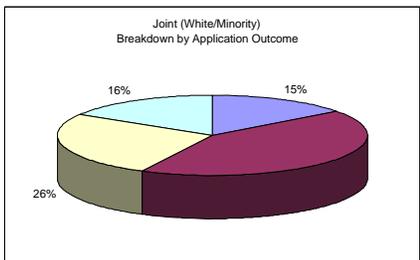
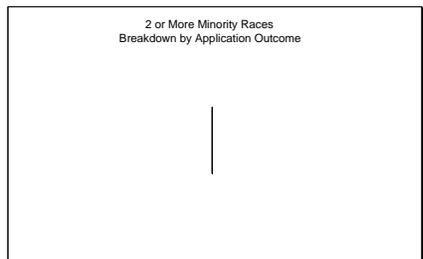
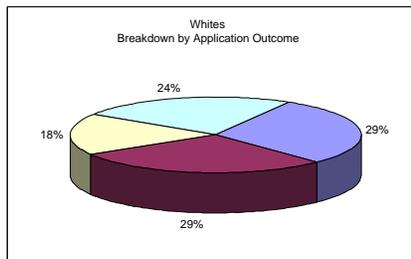
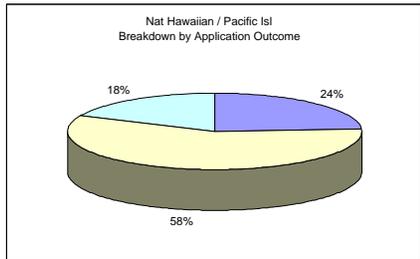
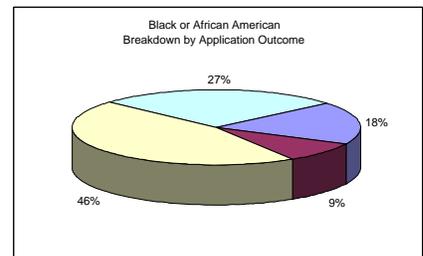
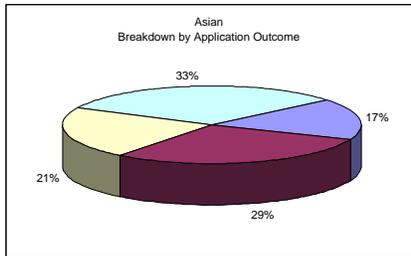
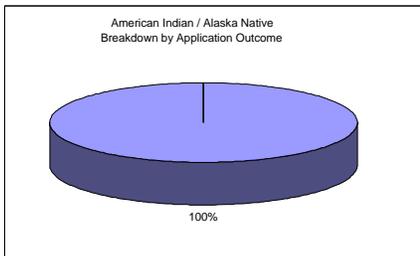
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	2	0%	2	0%	0	0%	0	0%	0	0%	0	0%
Asian	56	6%	38	5%	5	8%	6	6%	7	9%	0	0%
Black or African American	161	16%	107	14%	4	7%	34	34%	16	21%	0	0%
Nat Hawaiian/other Pac Isl	18	2%	13	2%	0	0%	4	4%	1	1%	0	0%
White	737	73%	597	77%	45	75%	46	46%	49	63%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	14	1%	9	1%	2	3%	2	2%	1	1%	0	0%
Race N/A	27	3%	12	2%	4	7%	7	7%	4	5%	0	0%
Total	1015	100%	778	100%	60	100%	99	100%	78	100%	0	0%

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



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

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

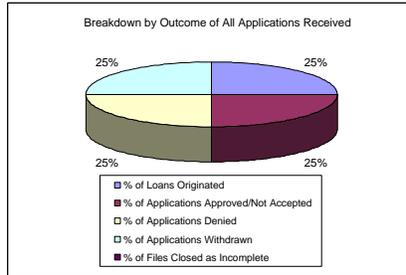
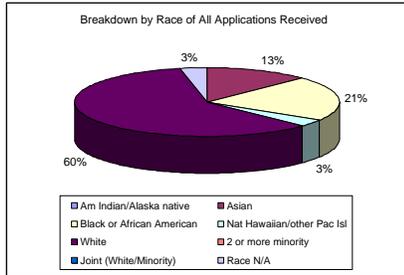


Sovereign Bank Low-Income Mortgage Information

2007

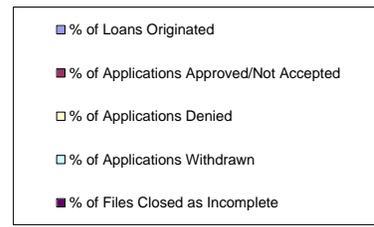
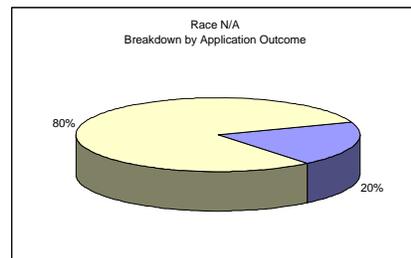
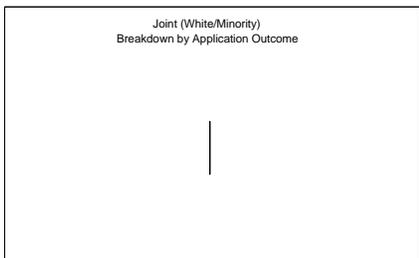
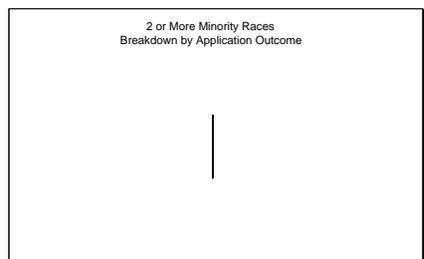
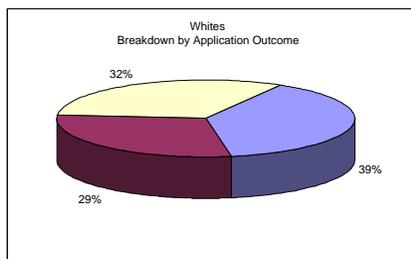
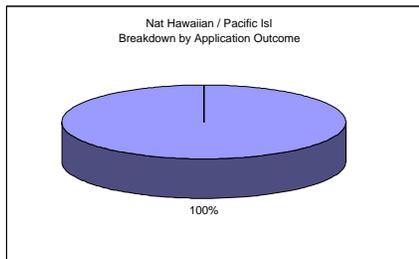
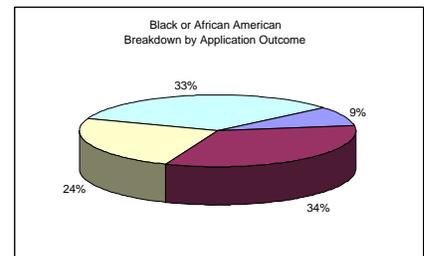
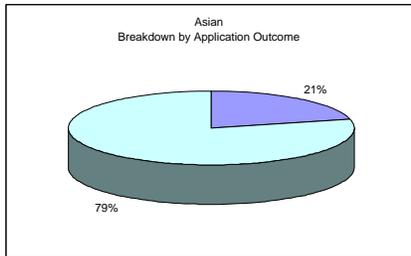
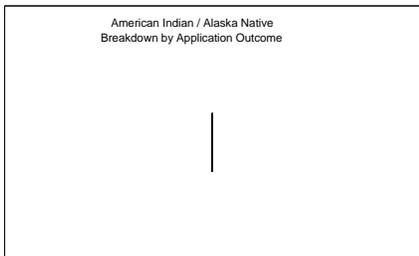
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	8	13%	6	13%	0	0%	0	0%	2	50%	0	0%
Black or African American	13	21%	6	13%	1	50%	4	36%	2	50%	0	0%
Nat Hawaiian/other Pac Isl	2	3%	2	4%	0	0%	0	0%	0	0%	0	0%
White	37	60%	30	67%	1	50%	6	55%	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	3%	1	2%	0	0%	1	9%	0	0%	0	0%
Total	62	100%	45	100%	2	100%	11	100%	4	100%	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.



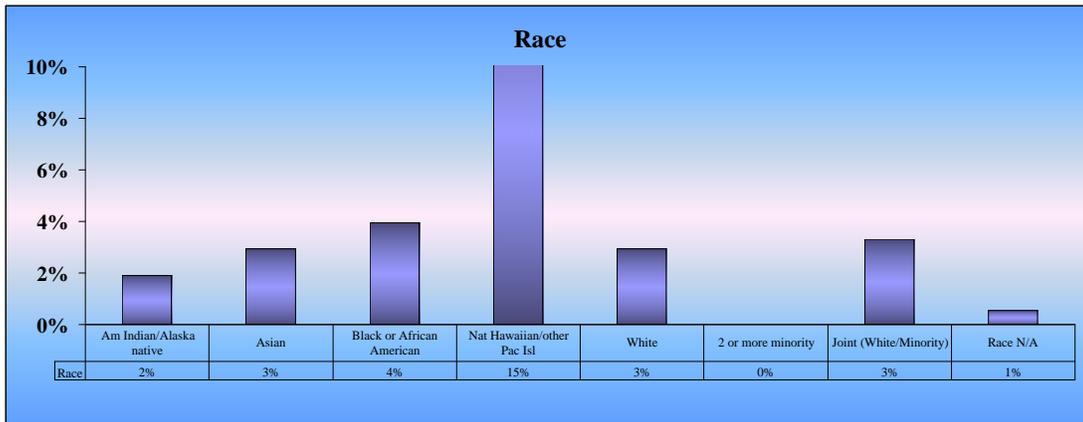
Compared against the MSA Aggregate Total

2007

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	2	2%	2	5%	0	0%	0	0%	0	0%	0	0%
Asian	56	3%	38	3%	5	3%	6	3%	7	5%	0	0%
Black or African American	161	4%	107	6%	4	1%	34	2%	16	5%	0	0%
Nat Hawaiian/other Pac Isl	18	15%	13	18%	0	0%	4	17%	1	8%	0	0%
White	737	3%	597	3%	45	2%	46	1%	49	3%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	14	3%	9	3%	2	7%	2	5%	1	4%	0	0%
Race N/A	27	1%	12	0%	4	1%	7	1%	4	1%	0	0%
Total	1015	3%	778	3%	60	2%	99	2%	78	3%	0	0%

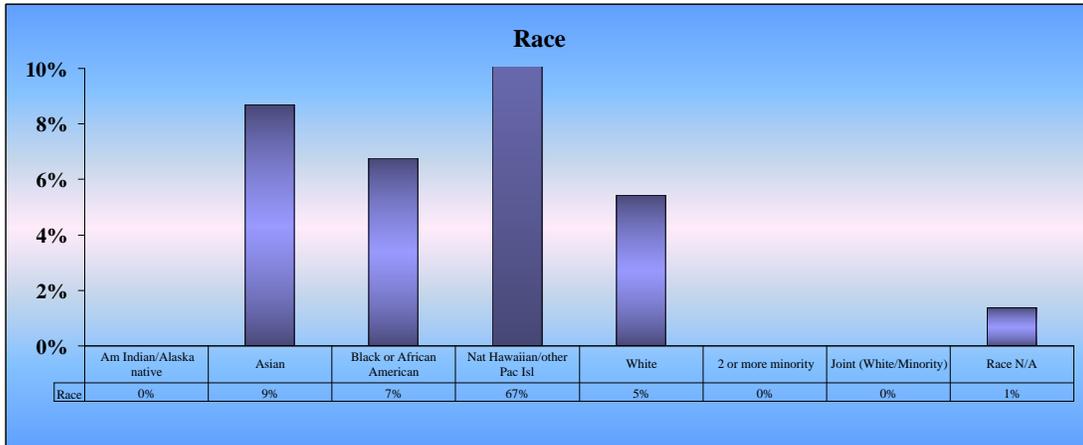
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Sovereign Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	8	9%	6	9%	0	0%	0	0%	2	40%	0	0%
Black or African American	13	7%	6	7%	1	9%	4	5%	2	17%	0	0%
Nat Hawaiian/other Pac Isl	2	67%	2	100%	0	0%	0	0%	0	0%	0	0%
White	37	5%	30	7%	1	2%	6	5%	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%	1	2%	0	0%	1	2%	0	0%	0	0%
Total	62	6%	45	7%	2	3%	11	4%	4	4%	0	0%

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





Employment Information

No data available





Wainwright Bank & Trust



Wainwright Bank Overview

Wainwright Bank & Trust
63 Franklin Street
Boston, MA 02110

Description

Wainwright Bank & Trust Company is a \$914 million state-chartered, investor-owned bank, headquartered in Boston. Wainwright Bank operates eleven full-service branches and has made socially responsible banking a significant part of its brand image.

Loans account for 78.1% of the bank’s total assets. The bank’s asset size has grown 30.2% since 2005; the majority of this growth was invested in loans.

The bank is primarily a residential mortgage lender, with home mortgage loans secured by one- to four-family properties accounting for nearly half the bank’s loan portfolio (43.4%). Real estate loans make up 78.9% of the bank’s total loan distribution.

Principal Officers:

CEO and President

Jan A. Miller
63 Franklin Street
Boston, MA 02110
617-478-4000

CFO

James J. Barrett
63 Franklin Street
Boston, MA 02110
617-478-4000

Chief Compliance Officer

Stephen M. Evans
63 Franklin Street
Boston, MA 02110
617-478-4000

Employees

Number of Employees	161 ²⁰¹
Number of Employees in Massachusetts	161
Percentage of Women Employees	14%
Percentage of Minority Employees	5%

Branches

Number of Branches - Total	11
Branches Within Boston PSMA	3
Number of ATMs	11
Number of Free-Standing ATMs	0

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2008
Overall Rating	OUTSTANDING²⁰²
Lending Test Rating	OUTSTANDING
Community Development Test Rating	OUTSTANDING

²⁰¹ FDIC Institution Directory

²⁰² Based on most recent CRA Performance Evaluation by FDIC published 2008.



Discussion

Overall rating: OUTSTANDING²⁰³

Wainwright Bank was evaluated under the FDIC's revised Intermediate Small Bank CRA procedures, which replace the Lending, Investment, and Service Tests with a Lending Test and Community Development Test.

Lending Test

Lending Test Rating:
OUTSTANDING²⁰⁴

General Responsiveness to Credit Needs

Wainwright Bank's loan-to-deposit ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs. A majority of the Bank's loans are in the assessment area. The distribution of borrowers, given the demographics of the assessment area, reflects excellent penetration among individuals of different income levels, including low- and moderate-income, and businesses of different sizes. The geographic distribution of loans reflects excellent dispersion throughout the assessment area.

The Bank's average net loan-to-deposit ratio is 107.7%, significantly higher than that of most similarly situated institutions evaluated by the FDIC.

Also noted was an increase in home mortgage lending volume (by number) within the assessment area from 2006 to 2007. Home mortgage loan activity in the assessment area increased from 64.8% of the total number of loans in 2006 to 65.6% during 2007. Additionally, the Bank's percentage of small business lending within its assessment area is also on an increasing trend.

Responsiveness to Low- and Moderate-Income Credit Needs

The distribution of Wainwright Bank's loans among the different income categories reflects an excellent penetration.

During 2006, the Bank's overall lending to low-income borrowers was significantly higher (at 10.7%) than aggregate lenders' performance (at 3.9%). This excellent performance is a reflection of the Bank's efforts in reaching low- and moderate-income borrowers.

The Bank has several programs in place to assist low- and moderate-income borrowers with purchasing homes, such as their first-time homebuyers program. The Bank also offers affordable mortgage programs which are geared to low- and moderate-income borrowers. While the Bank's overall low-income lending performance (at 10.7%) is not consistent with the percentage of low-income families in the assessment area (at 29.8%), this discrepancy is not unexpected given the high cost of housing in the assessment area.

During 2006, the Bank's overall lending to moderate-income borrowers was significantly higher (at 32.0%) than aggregate lenders' performance (at 16.2%). Again, this excellent performance reflects positively on the Bank, illustrating its ability to reach moderate-income borrowers with its loan products and programs that assist low- and moderate-income borrowers with their lending needs.

The comparison of the Bank's moderate-income lending performance (at 32.0%) compared with the percentage of moderate-income families in the assessment area (at 19.1%) reveals the Bank is exceeding demographic indicators. This performance is excellent, especially considering the level of income earned by moderate-income families and the cost of housing in the assessment area.

The bank's 2007 home mortgage lending performance followed similar distribution patterns.

²⁰³ Based on most recent CRA Performance Evaluation by FDIC published by 2008.

²⁰⁴ Ibid.



Community Development Test

Community Development Test Rating:
OUTSTANDING²⁰⁵

General Responsiveness to Community Needs

Wainwright Bank's community development performance demonstrates an excellent responsiveness to the community development needs in its assessment area through community development lending, qualified investments, and community development services.

The bank is a leader and an innovator in its community development lending efforts; this lending is considered a strength of the institution. The level of the bank's qualified investments is considered excellent. Additionally, the Bank is actively involved in various community development organizations and financial education initiatives.

Community Development Lending

Wainwright Bank and Trust Company has an excellent number of loans and demonstrates excellent responsiveness to community development needs.

Throughout the evaluation period of May 10, 2005, through May 5, 2008, the Bank made 81 qualified community development loans totaling \$270,561,998. For comparison purposes, at the 2005 FDIC CRA Evaluation, which reviewed community development lending over a similar length of time, Wainwright Bank had made 98 community development loans totaling \$90,000,000.

Wainwright Bank made 31 community development loans totaling \$92,262,187 in 2007. This represents 13.1 percent of net loans of \$705.6 million as of December 31, 2007. Of these, 16 loans totaling \$67.7 million were for affordable housing for low- and moderate-income individuals.

The following is a sample of community development loans made in 2007:

- A \$700,000 commercial real estate loan to a non-profit for the acquisition of a 12-unit

transitional housing property in Lawrence, MA. This non-profit is the only homeless shelter in Massachusetts with an entirely bilingual staff serving Latino homeless families.

- A \$1,000,000 term loan and a \$300,000 working capital line to a Boston based non-profit, to finance a new facility in Boston. This organization provides housing, and innovative and comprehensive direct care services, to individuals and families with very specialized needs.
- A \$7,500,000 construction to permanent loan to a non-profit for the purpose of developing 99 new service-enriched units for the elderly, including assisted living units as well as independent senior units with services available, at the site of the of a former school.

Qualified Investments & Donations

Wainwright Bank and Trust Company has an excellent level of investments and donations and demonstrates excellent responsiveness to community development needs. The Bank ably identifies the needs of its community and invests a high level of funds to organizations that have community development purposes.

During the evaluation period, the Bank made a total of 9 equity investments totaling \$19,404,051. This represents 13.6 percent of total investments of \$142,398,000 as of March 31, 2008.

Significant qualified equity investments on the Bank's books include:

- Ruggles Street Limited Partnership (\$4.2 million commitment)
- Pond Home Assisted Living (\$3.1 million)
- Pine Street Inn (\$4.4 million)
- Wayside Youth & Family Support (\$5.0 million)
- Massachusetts Housing Investment Corporation New Markets Tax Credits (\$5.3 million)

During the evaluation period, the Bank made qualified donations totaling \$163,930 representing 24.2 percent of the Bank's total donations of \$676,669. For 2006, the Bank's donations equaled 0.5 percent of pre-tax net operating income. That percentage increased to 0.9 percent in 2007.

²⁰⁵ Based on most recent CRA Performance Evaluation by FDIC published 2008.



In 2007, the bank made 61 qualified donations totaling \$69.6 million. Of these, 42 (\$55.6 million) were donations to community services targeted to low- and moderate-income individuals.

Community Development Services

Wainwright Bank and Trust Company has a good level of qualified community development services demonstrating a good responsiveness to the area’s community development needs.

During the evaluation period, the Bank’s officers and staff members provided financial or technical expertise to several organizations involved in either economic development, initiatives to revitalize low- and moderate-income census tracts, affordable housing or, human services that target low- and moderate-income individuals.

During the evaluation period, officers and employees of the Bank provide and participated in several programs and services related to financial services:

First-Time Homebuyer Seminars - The Vice President of Residential and Consumer Lending conducted five first time homebuyer seminars in 2007 through the Citizens’ Housing and Planning Association. Attendance at these programs is mandatory for prospective participants in the Massachusetts Housing Partnership’s Soft Second program, which targets low- and moderate-income home buyers.

Financial Education - The Vice President of Residential and Consumer Lending also taught financial education to two adult groups at the Action for Boston Community Development, Inc. in 2007. Additionally, as part of Operation HOPE’s Banking on Our Future Program, the Vice President of Residential and Consumer Lending taught over 200 middle and high school students. A Branch Officer also taught four classes as part of this program.

CommunityRoom.net - The Bank maintains a website for non-profit business customers of the Bank that do not have the resources to launch their own internet sites. This site provides non-profit businesses with a hosted website with online giving capabilities. Participating

businesses pay no fees, and all costs (except processing fees for debit or credit card transactions) are donated by the Bank.

Community Rooms - After-hours rooms available for free to non-profit business customers of the Bank. The Bank offers community rooms at nine branch locations.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
155 Dartmouth Street Boston, 02116	✓	✓
687 Centre Street Jamaica Plain, 02130	✓	✓
63 Franklin Street Boston, 02110	✓	✓

FSB: Full Service Branch

Additional Information

The bank’s staff at all levels reflect the diversity of the community and the customer base. Half of the banking officers are women, and half the board of directors is comprised of women, minorities, gays, and lesbians. The staff is cumulatively fluent in 17 languages.²⁰⁶

²⁰⁶ Based on most recent CRA Performance Evaluation by FDIC published by 2008.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

Wainwright Bank's HMDA lending increased substantially in 2005, with originations increasing over 60%.

In 2006, HMDA lending plummeted to less than one third of its 2004 levels, and there were no low-income HMDA loans reported. In 2007, HMDA lending more than doubled but low-income HMDA lending remained zero.²⁰⁷

	2005	2006	2007
HMDA Applications Received	83	27	52
HMDA Loans Originated	78	21	47
Low-Income Applications Received	5	0	2
Low-Income Loans Originated	4	0	0

Small Business Loans

No 2007 HMDA-reportable small business loan data was available for Wainwright Bank.²⁰⁸

Loan Information By Census Tract

Please refer to the addendum The 2007 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

²⁰⁷ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

²⁰⁸ Ibid.



Source Documents

Community Reinvestment Act Performance Evaluation. Federal Deposit Insurance Corporation; May 5, 2008.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Wainwright Bank Annual Report 2007.

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

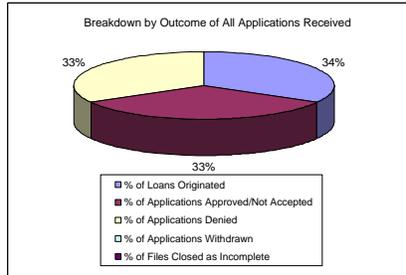
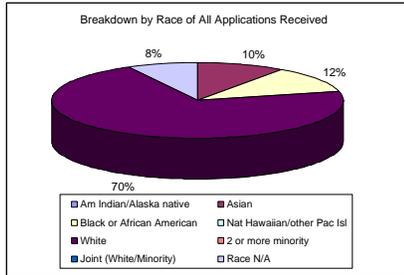
Wainwright Bank website:
<http://www.wainwrightbank.com/>

Wainwright Bank HMDA Mortgage Information

2007

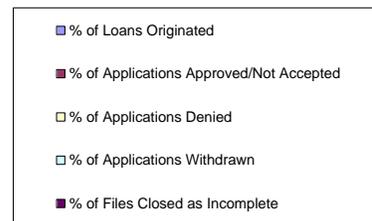
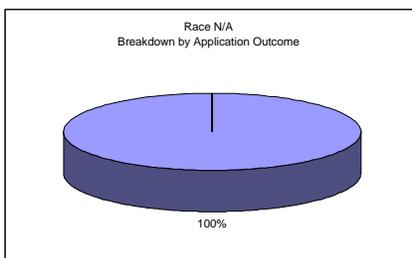
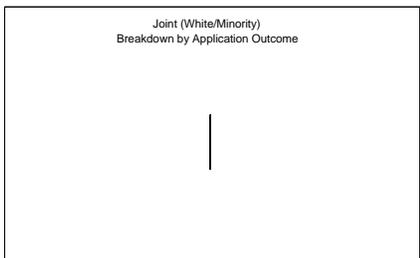
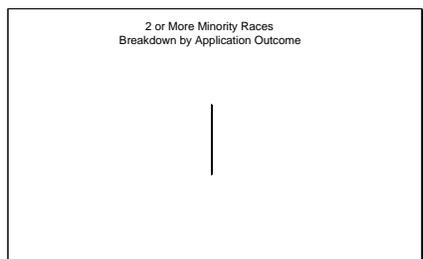
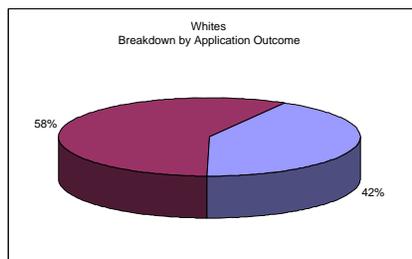
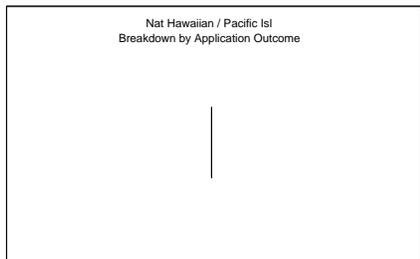
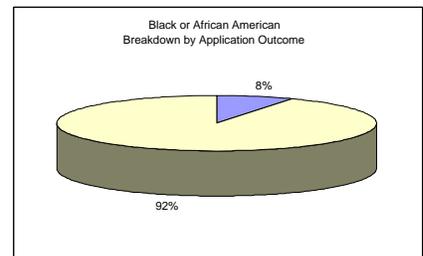
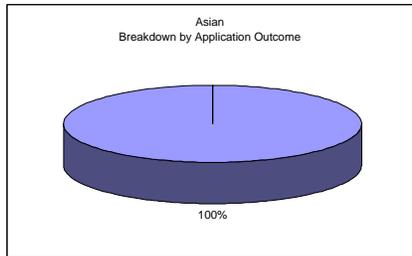
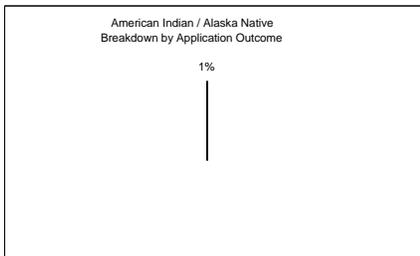
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	5	10%	5	11%	0	0%	0	0%	0	0%	0	0%
Black or African American	6	12%	4	9%	0	0%	2	100%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	37	71%	34	72%	3	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	4	0%	4	9%	0	0%	0	0%	0	0%	0	0%
Total	52	100%	47	100%	3	100%	2	100%	0	0%	0	0%

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



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

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



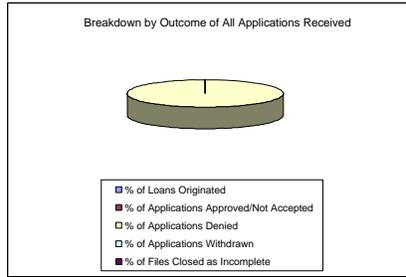
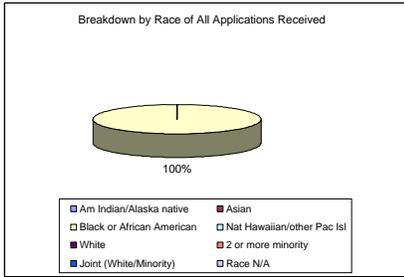
Wainwright Bank Low-Income Mortgage Information

Note: No Data Reported For "Less Than 50% OF MSA/MD Median"

2007

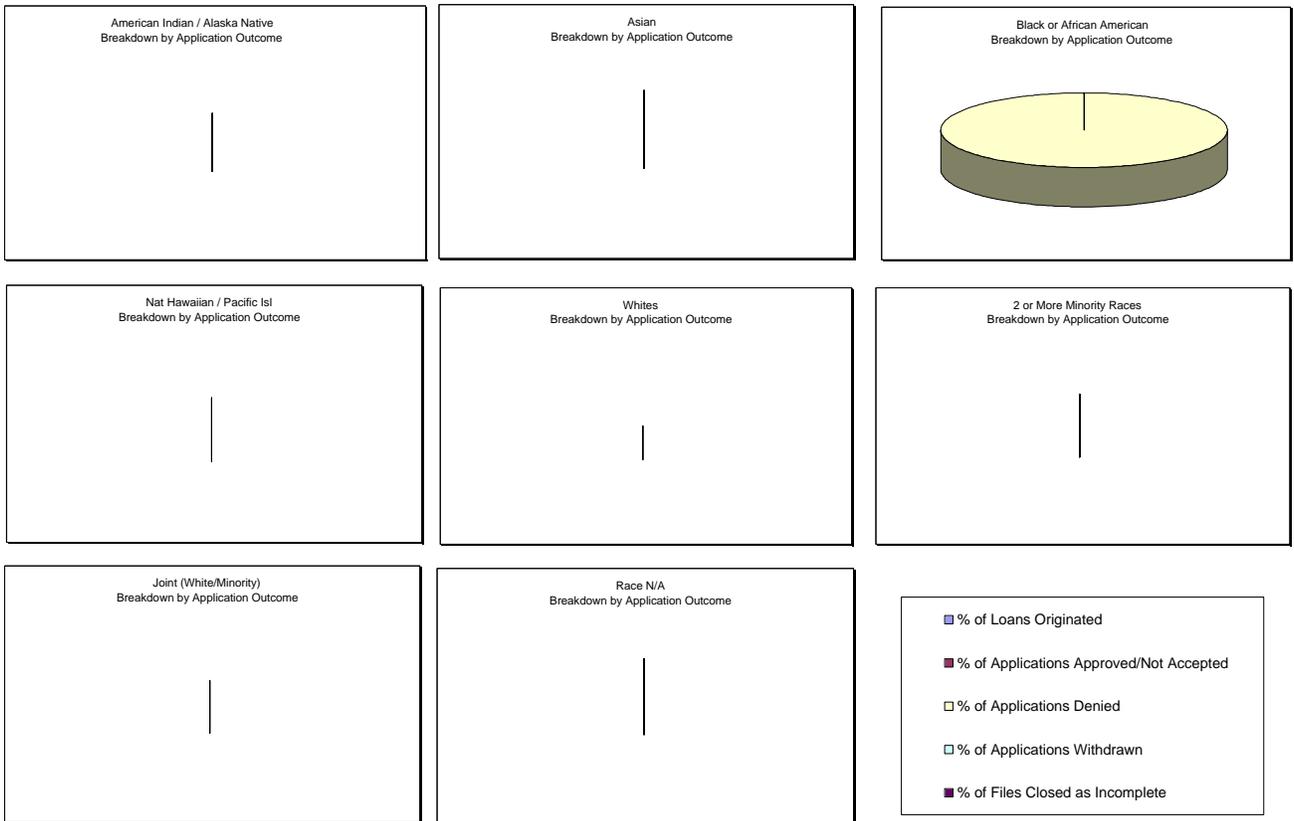
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of 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	100%	0	0%	0	0%	2	100%	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	2	100%	0	0%	0	0%	2	100%	0	0%	0	0%

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



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

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



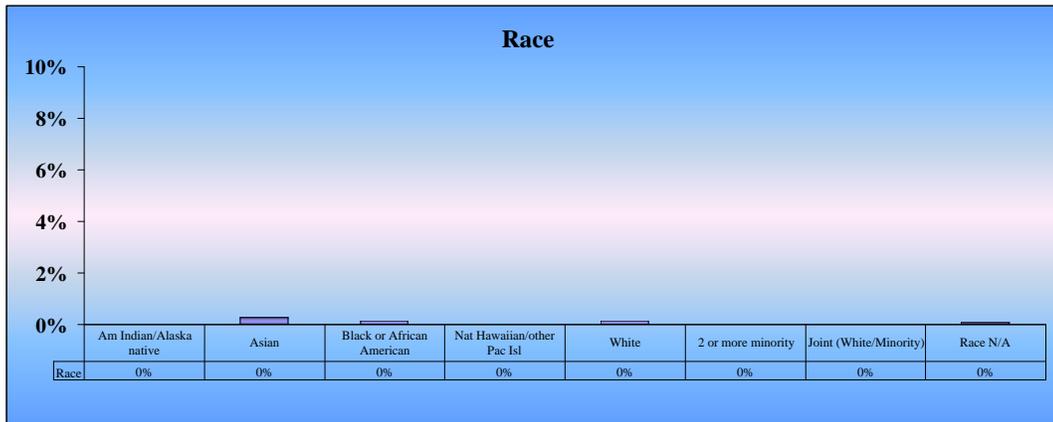
Compared against the MSA Aggregate Total

2007

Wainwright Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	5	0%	5	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	6	0%	4	0%	0	0%	2	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	37	0%	34	0%	3	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	4	0%	4	0%	0	0%	0	0%	0	0%	0	0%
Total	52	0%	47	0%	3	0%	2	0%	0	0%	0	0%

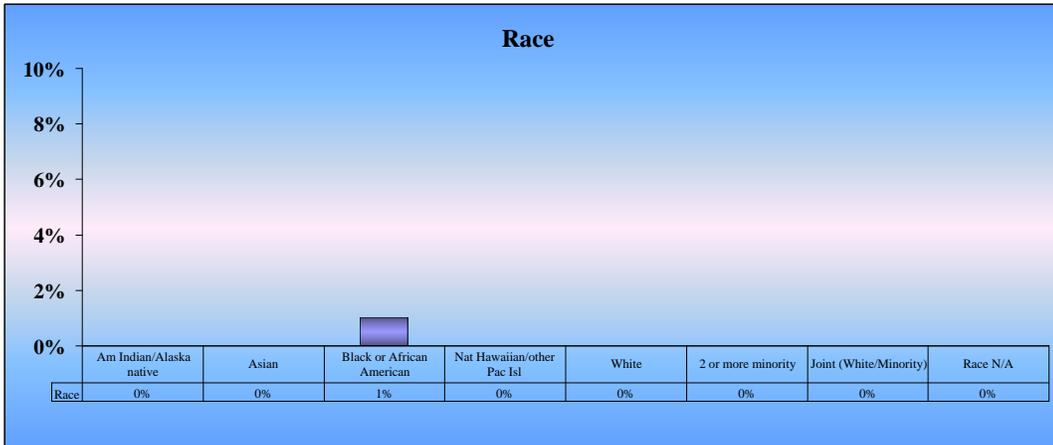
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Wainwright Bank Low-Income Mortgage Information

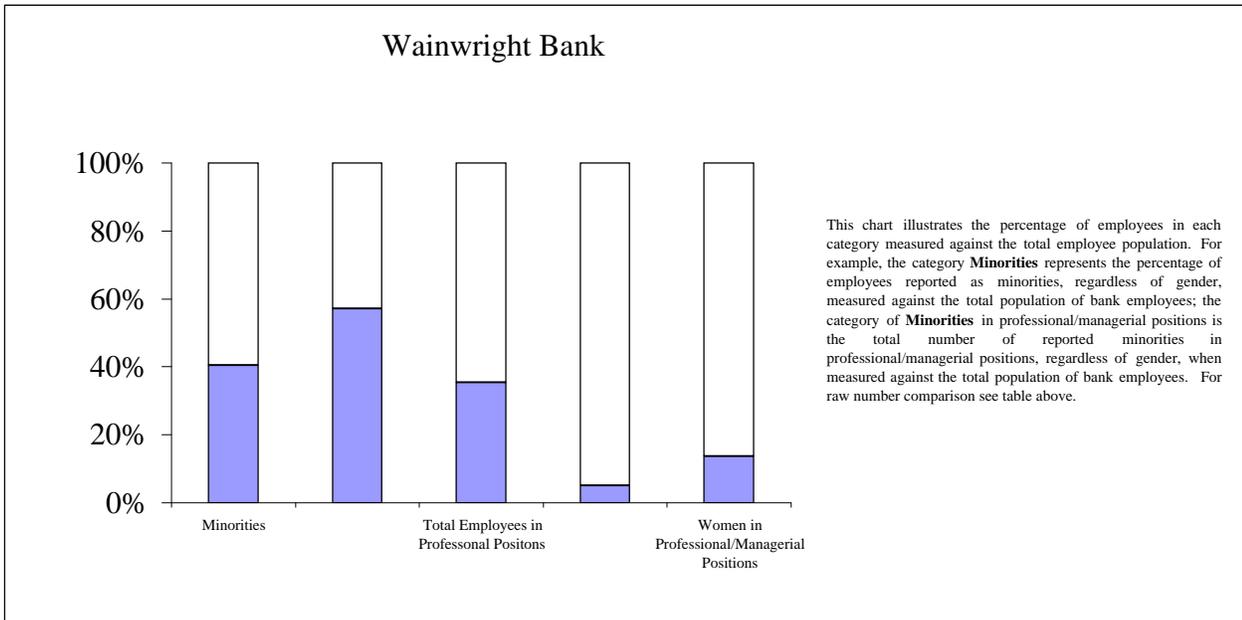
Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
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	1%	0	0%	0	0%	2	2%	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	2	0%	0	0%	0	0%	2	1%	0	0%	0	0%

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



Wainwright Bank Employment Information

	Number of Employees	Percent of Total Employees
Total	161	
Minorities	65	40%
Women	92	57%
Total Employees In Professional Positions	57	35%
Minorities in Professional or Managerial Positions	8	5%
Women in Professional or Managerial Positions	22	14%







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; December 31, 2006.

Bank of America Annual Report 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

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

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

Boston Private Bank

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; February 5, 2008.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

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

Boston Private Wealth Management Group Annual Report 2007

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

Cathay Bank

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; April 2, 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Cathay Bank 2007 Annual Report.

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

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

Century Bank & Trust

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation, November 21, 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Century Bank 2007 Annual Report.

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



RBS Citizens of Massachusetts:

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

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; December 2, 2002.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Citizens Financial Group Annual Report 2007.

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

East Boston Savings Bank

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; November 1, 2005.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

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

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

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

Eastern Bank:

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; June 25, 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Eastern Bank 2007 Annual Report.

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

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

Hyde Park Cooperative Bank

Community Reinvestment Act Performance Evaluation, Office of Thrift Supervision; March 17, 2004.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

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

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



Hyde Park Savings Bank

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; August 14, 2006.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

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

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

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

JPMorgan Chase Bank

Community Reinvestment Act Performance Evaluation, Federal Reserve Bank of New York; September 8, 2003.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

JPMorgan Chase & Co. Annual Report 2007.

JPMorgan Chase Bank website
<http://www.jpmorganchase.com/>

Bank of New York Mellon

Community Reinvestment Act Performance Evaluation, Federal Reserve Bank of New York; May 21, 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

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

Mellon Financial Corporation Annual Report 2007.

Bank of New York Mellon website:
<http://www.bnymellon.com/>

Mt. Washington Bank

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; November 19, 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

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

Mt. Washington Bank website:
<http://www.mtwashingtonbank.com/>



OneUnited Bank

Community Reinvestment Evaluation, Federal Deposit Insurance Corporation; April 3, 2007.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

"Consolidated Reports of Condition and Income for A Bank With Domestic Offices Only - FFIEC 041," FFIEC, December 31, 2007.

Massachusetts Division of Banks, Summary Information for State Chartered Banks and Credit Unions:

<http://db.state.ma.us/dob/in-choose.asp>

OneUnited website:

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

Sovereign Bank

Community Reinvestment Act Performance Evaluation, Office of Thrift Supervision; March 11, 2005.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Sovereign Bank Annual Report 2007.

FDIC Institution Directory:

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

Sovereign Bank website

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

Wainwright Bank

Community Reinvestment Act Performance Evaluation. Federal Deposit Insurance Corporation; May 5, 2008.

FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2007.

2006 Linked Deposit Banking Report to the Mayor of the City of Boston, NobleAssociates; March 2008.

Wainwright Bank Annual Report 2007.

FDIC Institution Directory:

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

Wainwright Bank website:

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



Appendix B



Appendix B

Community Reinvestment Act

Overview

The Community Reinvestment Act (CRA) was placed into law in 1977. Its primary purpose was to prevent redlining. It requires banks and other savings institutions to take positive steps in meeting the credit needs of all the communities to whom they provide services. This includes those in low- and moderate-income areas.

The Federal Reserve Board, Office of the Comptroller of the Currency, Office of Thrift Supervision and the Federal Deposit Insurance Corporation, review and evaluate whether banks are meeting the credit needs of the communities being served. This evaluation, depending on its outcome, can impact an institution's ability to expand through opening new branches or merging with another institution.

The CRA gives the areas being served the ability to intervene in the process of regulation. Some of the concerned citizens groups may include: community groups, non-profit development organizations, small business organizations, and public agencies. They may make specific recommendations as to specific areas of improvement, depending on the performance of the financial institution in question.

Programs are then developed that list the steps that must be taken in order for the institution to improve its lending record in low and moderate-income areas.

The CRA has freed up more than a trillion dollars in loans targeted to residents and businesses located in urban and rural neighborhoods. Financial institutions have also found that the CRA can provide additional, profitable business, so they take it very seriously.

CRA examinations are conducted regularly. The examiners look at five categories:

1. Ascertainment of community needs.
2. Marketing and types of credit offered and extended.
3. Geographic distribution and record of opening and closing offices.
4. Discrimination and other illegal practices.
5. Community Development.

The exam period varies from six months, for an institution that has an unsatisfactory rating; to twelve months for a billion dollar, or larger, national bank; to several years for smaller institutions regulated by the Office of the Comptroller of the Currency (OCC).

The Financial Institutions Reform, Recovery and Enforcement Act of 1989 (FIRREA), formerly known as the S&L Bailout Bill, made three major changes to the CRA:

- Ratings for institutions were changed. Previously there had been a scale of one to five; one being "outstanding", and five being "substantial non-compliance". The general (or overall) ratings are now reported in four categories: (Ratings within specific test areas continue to be reported in five categories as outlined in Appendix C).
 - Outstanding
 - Satisfactory
 - Needs Improvement
 - Substantial Non-Compliance
- All ratings are now disclosed to the institutions and to the public. CRA evaluations are now published.
- As of January, 1997, large banks are being evaluated based on their lending, service and investment activities. Larger institutions are being required to disclose information about their small business lending activity, and their mortgage lending activity outside of metropolitan area



Appendix C



Appendix C

Rating Definitions

Lending Performance

Outstanding

Excellent responsiveness to credit needs in its assessment area(s) taking into consideration the number and amount of home mortgage, small business, small farm, and consumer loans, if applicable, in its assessment area(s). A substantial majority of its loans are made in its assessment area. An excellent geographic distribution of loans in its assessment area(s). An excellent record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms). Extensive use of innovative or flexible lending practices, in a safe and sound manner, to address the credit needs of low or moderate-income individuals or geographies. Is a leader in making community development loans.

High Satisfactory

Good responsiveness to the credit needs in its assessment area(s), taking into account the number and amount of home mortgage, small business, small farm, and consumer loans, if applicable, in its assessment area(s). A high percentage of loans are made in its assessment area(s). A good geographic distribution of loans in its assessment area(s). A good distribution, particularly in its assessment area(s), of loans among individuals of different income levels and businesses) of different sizes (including farms), given the product lines of the bank. A good record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms). Use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low or moderate-income individuals or geographies. It has made a relatively high level of community development loans.

Low Satisfactory

Adequate responsiveness to credit needs in its assessment area(s), taking into account the number and amount of home mortgage, small business, small farm, and consumer loans, if applicable, in its assessment area(s). An adequate percentage of its loans are made in its assessment area(s). An adequate geographic

distribution of loans in its assessment area(s). An adequate distribution, particularly in its assessment area(s), of loans among individuals of different income levels and businesses of different sizes (including farms), given the product lines offered by the bank. An adequate record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms). Limited use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low or moderate-income individuals or geographies. Has made an adequate level of community development loans.

Needs to Improve

Poor responsiveness to credit needs in its assessment area(s), taking into account the number and amount of home mortgage, small business, small farm and consumer loans, if applicable, in its assessment area(s). A small percentage of its loans are made in its assessment area(s). A poor geographic distribution of loans, particularly to low or moderate-income geographies, in its assessment area(s). A poor distribution, particularly in its assessment area(s), of loans among individuals of different income levels and businesses of different sizes (including farms), given the product lines of the bank. A poor record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms);. Little use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low and moderate-income individuals and geographies. It has made a low level of community development loans.

Substantial Noncompliance

A very poor responsiveness to credit needs in its assessment area(s), taking into account the number and amount of home mortgage, small business, small farm, and consumer loans, if applicable, in its assessment area(s). A very small percentage of its loans made in its assessment area(s). A very poor geographic distribution of loans, particularly in its assessment area(s), of loans among individuals of different income levels and businesses of different sizes (including farms), given the product lines offered by the bank. A very poor record of serving the credit needs of highly



economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms). No use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low or moderate-income individuals or geographies. It has few, if any community development loans.

Investment Performance

Outstanding

An excellent level of qualified investments, particularly those that are not routinely provided by private investors. Often in a leadership position. Extensive use of innovative or complex, qualified investments. Excellent responsiveness to credit and community development needs.

High Satisfactory

A significant level of qualified investments, particularly those that are not routinely provided by private investors. Occasionally in a leadership position. Extensive use of innovative or complex, qualified investments. Excellent responsiveness to credit and community development needs.

Low Satisfactory

An adequate level of qualified investments, particularly those that are not routinely provided by private investors. Rarely in a leadership position. Occasional use of innovative or complex, qualified investments. Adequate responsiveness to credit and community development needs.

Needs to improve

A poor level of qualified investments, particularly those that are not routinely provided by private investors. Rare use of innovative or complex qualified investments. Poor responsiveness to credit and community development needs.

Substantial noncompliance

Few if any, qualified investments, particularly those that are not routinely provided by private investors. No use of innovative or complex qualified investments. Very poor responsiveness to credit and community development needs.

Service Performance

Outstanding

Its service delivery systems are readily accessible to geographies and individuals of different income levels in its assessment area(s); To the extent changes have been made, its record of opening and closing branches has improved the accessibility of its delivery systems, particularly in low or moderate-income geographies or to low or moderate-income individuals; Its services (including, where appropriate, business hours) are tailored to the convenience and needs of its assessment area(s), particularly low or moderate-income geographies or low or moderate-income individuals; It is a leader in providing community development services.

High Satisfactory

Its service delivery systems are accessible to geographies and individuals of different income levels in its assessment area(s). Its record of opening and closing branches has not adversely 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





NobleAssociates



NobleAssociates

120 Coolidge Street
Brookline, MA 02446-5808
(877) 975-1590 toll free
jnoble@nobleassociates.com

NobleAssociates prepared this document for the City of Boston.

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

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