



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

April 16, 2007

# **Community Reinvestment Act Performance Evaluation**

**Bankers Trust Company, National Association  
Charter Number: 23958**

**453 7<sup>th</sup> Street  
Des Moines, IA 50309**

**Office of the Comptroller of the Currency**

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Omaha, NE 68154-5298**

**NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Outstanding**.

The following table indicates the performance level of **Bankers Trust Company, National Association** (BTC) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Bankers Trust Company, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- BTC's volume of home mortgage loans and small loans to businesses reflected good responsiveness to the credit needs of the Des Moines MSA assessment area.
- The bank achieved an excellent dispersion of loans among borrowers of different income levels.
- The geographic distribution of BTC's reported loans reflected good penetration throughout assessment area geographies, including low-to-moderate (LMI) census tracts.
- BTC was a leader in making community development loans. Qualified loans totaled \$17 million.
- The bank participated in several flexible loan programs designed to help meet credit needs of LMI borrowers and geographies.
- Investments reflected an excellent responsiveness by BTC to community development needs in the bank's assessment area. The bank made over \$5 million in qualified investments during the evaluation period.
- The bank's service delivery systems were readily accessible to geographies and individuals of different income levels throughout the Des Moines MSA assessment area.
- BTC was a leader in providing community development services.

## Definitions and Common Abbreviations

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

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

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

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

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

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

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

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

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

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

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

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

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

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

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

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

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

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

## Description of Institution

BTC is a full-service financial institution headquartered in Des Moines, IA. The bank offers a full range of credit products within its assessment area including commercial, real estate, and consumer loan products. The bank's primary business focus is residential real estate lending and large commercial banking relationships with preferred loan amounts in excess of \$500 thousand.

For CRA evaluation purposes, BTC is an intrastate bank with offices located in Iowa only. As of April 16, 2007, the bank had 11 banking offices, all located in the Des Moines, IA MSA #19780.

MidAmerica Financial Corporation owns 100 percent of the bank and an affiliate bank in Cedar Rapids, IA. BTC Financial Corporation owns 100 percent of MidAmerica Financial Corporation. Both corporations are bank holding companies headquartered in Des Moines, IA. BTC has three subsidiaries; however, only one was an active company during the evaluation period. Bankers Trust Company, N.A. of South Dakota specializes in estate tax planning for affluent customers. The subsidiary did not impact the bank's capacity to lend or invest in the community. The bank had no merger or acquisition activities during the evaluation period.

As of March 31, 2007, BTC had \$1.9 billion in total assets and Tier 1 capital of \$132 million. The bank's loan-to-deposit ratio on that date was 121 percent, and net loans represented 72 percent of total assets. By dollar amount, the loan portfolio consisted of the following types of credit: 56 percent commercial and commercial real estate; 33 percent one- to four-family residential real estate; 8 percent other real estate; 1 percent consumer; and 2 percent other loans. The loan-to-deposit ratio and loan portfolio mix do not reflect the significant volume of home purchase and home mortgage refinance loans originated by BTC and sold on the secondary market. During 2004, 2005, and 2006, there were 1,651 such loans totaling \$219 million.

There are no known legal, financial, or other impediments that would hamper BTC's ability to help meet the credit needs of its assessment area. The bank attained an "Outstanding" rating at the last CRA examination dated May 24, 2004.

## **Scope of the Evaluation**

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

For home mortgage loans, small loans to businesses, and small loans to farms, the evaluation period was from January 1, 2004 to December 31, 2006. We based market comparisons on 2005 peer data. The evaluation period for community development loans, the Investment Test, and the Service Test was from May 25, 2004 to April 16, 2007.

### **Data Integrity**

As part of the CRA evaluation, we tested the accuracy of BTC's publicly filed information for home mortgage loans, small loans to businesses, and small loans to farms. We found no significant errors in the collected data and determined publicly filed data was accurate.

We also reviewed community development loans, investments, and services submitted by BTC to ensure they met the regulatory definition for community development. We excluded from this evaluation a few items submitted for consideration because they did not meet the definition or purpose of community development.

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

BTC has only one assessment area. We performed a full-scope review of this area.

### **Ratings**

The bank's overall rating is based on the area that received a full-scope review.

In determining conclusions for the Lending Test, we weighted loan products to be reflective of BTC's loan volume by product type during the evaluation period. We weighted home mortgage loans more heavily than small loans to businesses. During the evaluation period, home mortgage loans represented 81 percent of total reported loans in the assessment area, while small loans to businesses represented 19 percent of the total. Among HMDA loan categories, home purchase, home mortgage refinance, and home improvement loans represented 60 percent, 14 percent, and 7 percent of total reported loans, respectively. We did not evaluate HMDA multifamily loans or small loans to farms as the volume of these loans was insignificant. BTC originated only 7 HMDA multifamily loans and no small loans to farms in the assessment area during the evaluation period.

## **Fair Lending or Other Illegal Credit Practices Review**

We found no evidence of illegal discrimination or other illegal credit practices.



## Conclusions with Respect to Performance Tests

### LENDING TEST

#### Conclusions for Area Receiving Full-Scope Review

The bank's performance under the Lending Test is rated Outstanding. This is based on a full-scope review of the Des Moines MSA assessment area.

#### Lending Activity

*(Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.)*

The bank's lending activity reflected good responsiveness to assessment area credit needs. This was based primarily on the bank's good volume of home purchase and home improvement loans.

To analyze BTC's lending activity, we compared the bank's deposit market share with its lending market share for home mortgage loans and small loans to businesses. In comparing the market share percentages, we took into consideration that deposit market share information included only deposit-taking financial institutions that had one or more branches located in the assessment area. Lending market share information included lenders who did not have deposit-taking facilities in the assessment area, as well as a number of non-bank lenders such as mortgage companies. Deposit market share data included all deposit-taking financial institutions regardless of their size. Lending market share data included primarily larger banks. Also, BTC's lending market share did not include the 1,651 mortgage loans the bank originated and sold on the secondary market. Due to the different populations of financial institutions included in the data, we did not expect BTC's deposit and lending market share percentages to match in order for performance to be considered good.

Based on FDIC deposit market share data as of June 30, 2006, there were 36 deposit-taking financial institutions with one or more banking office in the bank's assessment area. BTC ranked third in size with a 13 percent market share.

The bank's volume of home purchase and home improvement loans was good. There were 293 lenders reporting one or more home purchase loans in the assessment area in 2005. BTC ranked sixth among these lenders with a 4 percent market share. There were 119 lenders reporting one or more home improvement loans in the assessment area in 2005. BTC ranked fifth among these lenders with a 3 percent market share.

The bank's volume of home mortgage refinance loans was adequate. There were 286 lenders reporting one or more home mortgage refinance loans in the assessment area in 2005. BTC ranked 21<sup>st</sup> among these lenders with a 1 percent market share.

The bank's volume of small loans to businesses was adequate. There were 52 lenders reporting one or more small loans to businesses in the assessment area in 2005. BTC ranked 13<sup>th</sup> among these lenders with a 2 percent market share.

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

The bank's geographic distribution of loans was good. This was based primarily on the good distribution of home purchase and home mortgage refinance loans in LMI census tracts. Also, we identified no conspicuous gaps in the geographic distribution of loans. BTC originated a good percentage of its reported loans within its assessment area.

### **Home Mortgage Loans**

*(Refer to Tables 2, 3, and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.)*

BTC's geographic distribution of home purchase and home mortgage refinance loans was good. For both products, the percentage of loans made in low-income census tracts exceeded the percentage of owner-occupied housing units in the assessment area that were located in low-income tracts. Market share performance was similar with the percentage of the bank's loans in low-income tracts for these loan products exceeding the bank's overall home purchase and home mortgage refinance market share percentages.

The percentage of home purchase and home mortgage refinance loans made in moderate-income tracts was below the percentage of owner-occupied housing units located in those geographies. Performance was stronger when looking at market share data, as the bank's percentage of loans in moderate-income tracts met or was near to the bank's overall market share for these loan products.

The bank's geographic distribution of home improvement loans was excellent. BTC's percentage of loans in low-income tracts was more than four times the percentage of owner-occupied housing units in those geographies. The bank's percentage of loans in moderate-income census tracts was near to the percentage of owner-occupied housing units in moderate-income geographies. Market share performance was similar. Of particular note, the bank achieved a 17 percent market share of loans in low-income geographies.

### **Small Loans to Businesses**

*(Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.)*

The distribution of BTC's small loans to businesses by geography income level was excellent. The bank's percentage of loans made in low-income geographies exceeded the percentage of businesses in the assessment area that were located in those geographies by 57 percent. BTC's percentage of loans in moderate-income geographies was near to the percentage of businesses located in those tracts. Market share performance was also excellent as BTC's market share for small loans to businesses in LMI tracts exceeded or met the bank's overall market share for small loans to businesses of any size in the assessment area.

### **Lending Gap Analysis**

We reviewed maps and reports of BTC's home mortgage loans and small loans to businesses in the assessment area to identify gaps in the geographic distribution of these loans. We did not identify any conspicuous gaps in lending in the Des Moines MSA assessment area. During the evaluation period, BTC originated one or more loans in every census tract in the assessment area.

### **Inside/Outside Ratio**

A good percentage of the bank's reported loans were within its assessment area. During the evaluation period, the bank originated 82 percent of the number of reported home mortgage loans and small loans to businesses within its assessment area.

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

BTC's distribution of home mortgage loans and small loans to businesses to borrowers of different income levels was excellent. This was based primarily on the bank's excellent distribution of home mortgage loans.

When evaluating the borrower distribution of the bank's home mortgage loans in the Des Moines MSA assessment area, we considered the limited supply of decent homes in the market that were affordable to LMI borrowers. We recognized the shortage of decent affordable housing could make it difficult for the bank to originate home mortgage loans to LMI borrowers, especially low-income borrowers. Refer to "Scope of the Evaluation" and Appendix B for details on affordable housing availability.

### **Home Mortgage Loans**

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

Borrower distribution of home purchase, home improvement, and home mortgage refinance loans was excellent. For all three loan products, the bank's percentage of loans to moderate-income borrowers exceeded the percentage of families in the assessment area that were moderate-income. Of particular note, the bank's percentage of home purchase loans to moderate-income borrowers was almost twice the percentage of families in the assessment area that were moderate-income. In addition, for all three loan products, the bank's percentage of loans to low-income borrowers met or exceeded the percentage of families in the assessment area that were low-income.

Market share data also indicated excellent performance. For home purchase, home improvement, and home mortgage refinance loans, the bank's market shares to LMI borrowers met or exceeded the bank's overall market share percentages for these loan products.

### **Small Loans to Businesses**

*(Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.)*

The distribution of the bank's small loans to businesses by income level of the borrower was adequate. BTC's percentage of reported loans to businesses with revenues of \$1 million or less was below the percentage of businesses in the assessment area with revenues of \$1 million or less. In concluding performance was adequate, we took into consideration the fact that the bank's target market for business lending was larger businesses. Refer to "Description of Institution" for details.

Performance was stronger when looking at market share data. BTC's market share of loans to businesses with revenues of \$1 million or less met the bank's overall market share of small loans to businesses.

### **Community Development Lending**

*(Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.)*

BTC was a leader in making community development loans. During the evaluation period, the bank originated 64 community development loans totaling \$17 million. The bank's volume of community development loans was considered excellent, given the bank's size and community development opportunities in the assessment area. Qualified community development loans included \$9 million in working capital loans to two nonprofit organizations that provide residential, psychological, educational, and health services to LMI children with behavioral, mental, or physical challenges; and \$3 million in loans to seven entities providing affordable housing targeted to LMI individuals.

## Product Innovation and Flexibility

During the evaluation period, BTC participated in several flexible lending programs to help meet the credit needs of LMI borrowers in the Des Moines MSA assessment area. The bank's participation in these programs received positive consideration in the analysis of Lending Test performance. Flexible lending programs included:

- **Government loan programs:** BTC actively participated in housing loan programs sponsored by federal and state government agencies. These loan programs generally had reduced interest rates, lower down payment requirements, reduced closing costs, or more liberal underwriting criteria than conventional loans. During 2004, 2005, and 2006, BTC originated 72 loans totaling \$9 million under the Federal Housing Authority (FHA) loan programs, 33 loans totaling \$5 million under Veteran's Administration (VA) loan programs, and 35 loans totaling \$4 million under Iowa Finance Authority (IFA) loan programs.
- **Zero Down Mortgage Program:** BTC partnered with a local nonprofit organization that provided affordable housing and homeownership counseling for LMI persons. Under the Zero Down Mortgage Program, BTC provided first purchase mortgage loans with no required down payment or mortgage insurance to qualified LMI applicants who completed a homeowner education class provided by the nonprofit organization. During 2004, 2005, and 2006, BTC originated 588 loans totaling \$60 million under this program.
- **Purchase/Rehabilitation Loan Pools:** BTC purchased participations in several loan pools originated by a local certified community development financial institution. The CDFI offered various loan programs LMI persons or LMI areas designated for revitalization by the City of Des Moines and Polk County. During the evaluation period, BTC's total legally binding commitments to the various loan pools was almost \$7 million, while actual funded participations totaled \$3 million for 35 borrowers.
- **Polk County Housing Trust Fund:** The program provided up to \$6,000 in down payment and closing cost assistance for home purchase loans to LMI borrowers or in LMI geographies in Polk County. No information was available on the number or dollar amount of loans or grants provided under this program during the evaluation period.

## INVESTMENT TEST

### Conclusions for Area Receiving Full-Scope Review

The bank's performance under the Investment Test is rated Outstanding. This is based on a full-scope review of the Des Moines MSA assessment area.

*(Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.)*

The bank's volume of investments was excellent, given the bank's size and capacity and the moderate level of community development investment opportunities in the assessment area. During the evaluation period, BTC made \$2.6 million in qualified investments directly benefiting the bank's assessment area and \$2.5 million in investments benefiting a statewide or regional area that included the bank's assessment area. The bank's investments were highly responsive to credit and community development needs of the assessment area. Over \$4.5 million of the investments helped address the primary credit needs of the assessment area (rehabilitation of LMI neighborhoods, decent affordable housing for LMI individuals, and financing for small businesses). Refer to the market profile in Appendix B for more information on credit and community development needs in the assessment area, as well as the level of investment opportunities.

The bank's qualified investments included \$4.2 million in mortgage-backed securities targeted to LMI borrowers from the bank's assessment area or the greater Des Moines MSA. BTC also contributed over \$880 thousand to 28 organizations that primarily provided community services targeted to LMI individuals. BTC also had \$1.8 million in prior period investments that were still outstanding as of the end of the current evaluation period. These investments helped finance various projects in the assessment area, including affordable housing targeted to LMI, medical and community facilities targeted to LMI, and a convention center that helped revitalize an LMI area of the city.

## **SERVICE TEST**

### **Conclusions for Area Receiving Full-Scope Review**

The bank's performance under the Service Test is rated Outstanding. This is based on a full-scope review of the Des Moines MSA assessment area.

### **Retail Banking Services**

*(Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.)*

The bank's service delivery systems were readily accessible to geographies and individuals of different income levels throughout the assessment area. The percentage of the bank's branches in low-income census tracts significantly exceeded the percentage of the assessment area population located in those tracts. The percentage of branches in moderate-income geographies was below the percentage of the assessment area population located in moderate-income tracts; however, one branch located in a middle-income geography was across the street from a moderate-income census tract and provided good access for residents of several nearby moderate-income tracts.

BTC's record of opening and closing branch offices has not adversely affected the accessibility of delivery systems, particularly in LMI geographies and to LMI borrowers. During the evaluation period, the bank opened three branches, all in middle-income geographies. The bank did not close any branches during the evaluation period.

The bank's hours and services did not vary in a way that inconvenienced the assessment area, in particular LMI geographies or individuals. BTC supplemented its Monday through Friday hours with Saturday hours at all locations except two branches located in the central business district of downtown Des Moines. While these branches were located in a low-income census tract, the lack of hours on Saturday did not inconvenience the area or LMI individuals as there was minimal demand for access to banking services in the central business district on weekends. To better serve this area, the bank offered extended lobby hours at these branches during the week, opening earlier and closing later than all other branches. Services offered, including the availability of loan officers for all loan products, were virtually identical among all locations regardless of the income level of the geography.

BTC had effective alternative systems for delivering retail services in LMI geographies and to LMI individuals. The bank operated eight mobile branches during the evaluation period. The mobile branches primarily provided onsite banking services to nine assisted living facilities in the assessment area. The assisted living facilities primarily served LMI elderly and 33 percent were located in low-income geographies.

The bank's ATM network was also an effective alternative delivery system for reaching LMI geographies. BTC operated 58 ATMs throughout the Des Moines MSA assessment area, of which 21 percent were in low-income tracts and 21 percent were in moderate-income tracts.

### **Community Development Services**

BTC was a leader in providing community development services in the assessment area. This was based on the responsiveness of the services to the needs of the community, the number of organizations to which BTC provided community development services, and the leadership roles bank representatives assumed with these organizations. In total, BTC representatives used their financial expertise to provide almost 3,000 hours of service to over 50 organizations serving the Des Moines MSA assessment area. Services provided were responsive to community needs, including the needs for rehabilitation of LMI neighborhoods, affordable housing, and assistance to small businesses.

BTC employees often served in leadership roles. One or more BTC employee served on the Board of Directors for 34 community development organizations during the evaluation period. For the majority of these organizations, BTC employees provided vital services including participating in planning, budgeting, fundraising, hiring, and other administrative decisions. Bank representatives also served on various loan, finance, housing, and similar committees. In addition, BTC employees conducted numerous seminars on financial services targeted to potential homebuyers, elementary and high school students, and Spanish-speaking "un-banked" individuals. Participants were primarily LMI.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans):	1/1/2004 to 12/31/2006
	Investment Test, Service Test and CD Loans:	5/25/2004 to 4/16/2007
<b>Financial Institution</b>		<b>Products Reviewed</b>
Bankers Trust Company, National Association Des Moines, Iowa		Home mortgage loans, small loans to businesses, small loans to farms, and community development loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA – No affiliate products reviewed		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Des Moines, IA MSA #19780	Full-Scope	Metropolitan assessment area consisting of Polk County

## Appendix B: Market Profiles for Full-Scope Areas

### Des Moines, IA MSA #19780

Demographic Information for Full-Scope Area: Des Moines, IA MSA #19780						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	80	7%	25%	48%	20%	0%
Population by Geography	374,601	5%	21%	48%	26%	0%
Owner-Occupied Housing by Geography	102,623	2%	20%	51%	27%	0%
Businesses by Geography	31,422	14%	11%	46%	29%	0%
Farms by Geography	931	2%	7%	58%	33%	0%
Family Distribution by Income Level	97,182	17%	19%	25%	39%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	35,259	8%	32%	47%	13%	0%
Median Family Income	\$55,620	Median Housing Value		\$104,457		
HUD Adjusted Median Family Income for 2006	\$67,700	Unemployment Rate (March 2007)		3.3%		
Households Below the Poverty Level	8%					

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 U.S. Census, and 2006 HUD updated MFI.

BTC designated Polk County in the Des Moines, IA MSA #19780 as its assessment area. The MSA consists of five counties in central Iowa; however, BTC limited their assessment area to the area where the majority of the bank's lending and banking services were available. The bank's head office, ten branches, and all deposit-taking ATMs were located in Polk County. The assessment area meets the requirements of the CRA regulation and does not arbitrarily exclude any LMI geographies. Refer to the bank's CRA Public File for a map and list of census tracts within the Des Moines MSA assessment area.

The bank's deposits in the assessment area totaled approximately \$1.1 billion as of June 30, 2006. Based on FDIC deposit market share data as of that date, this equated to a 13 percent deposit market share and ranked BTC as the third largest deposit-taking financial institution in the assessment area. BTC was only slightly smaller than the two largest deposit-taking financial institutions, which had \$1.5 billion and \$1.2 billion in deposits in the assessment area and market shares of 17 percent and 13 percent, respectively.

Competition among financial institutions was strong. Thirty-six financial institutions operated 148 banking offices in BTC's Des Moines MSA assessment area as of June 30, 2006. Primary competitors included Wells Fargo Bank, N.A., Principal Bank, West Bank, Bank of America, N.A., and U.S. Bank, National Association. Credit unions, finance companies, and mortgage companies also competed for loan production throughout the assessment area. Aggregate HMDA data noted 378 lenders reporting mortgage loans in BTC's assessment area in 2005.



The area economy remained stable. A diversified economy kept the area's annual unemployment rate well under the national rate throughout the past decade. The annual average unemployment rate in 2006 for the Des Moines, IA MSA was 3.3 percent, compared to the U.S. unemployment rate of 4.6 percent. The service sector made up the largest portion of the labor economy. Major employers in the Des Moines area included Wells Fargo, the State of Iowa, Principal Financial Group, Mercy Medical Center, Iowa Health System, and the Des Moines School District.

According to community contacts, the primary needs in the assessment area related to rehabilitation of LMI neighborhoods, decent affordable housing for LMI individuals, and financing for small businesses. The needs for rehabilitation and affordable housing were related. Significant commercial expansion in the western portions of the Des Moines MSA created job demand outside the LMI geographies. As residents moved westward, this resulted in increased vacancies in affordable housing in LMI neighborhoods. Contacts noted a significant portion of the vacant housing was poorly built, aging, and in need of rehabilitation.

The most significant business-related credit needs were for equity or venture capital financing for small businesses. Contacts expressed a short supply of funds available to small businesses, especially in LMI tracts. However, the use of state and municipal loan programs and non-traditional lending products, such as micro business loan programs, has improved the supply of financing sources.

A moderate level of resources and opportunities existed to facilitate activities to address unmet credit and community development needs in the assessment area. The Des Moines MSA no longer has a HUD-designated Enterprise Community; however, the city has designated a large portion of the LMI areas of the city as targeted for redevelopment. This designation provided incentives to lend or invest in the targeted area. Actual partnerships to date have been somewhat limited. For example, there was only one community development financial institution in the MSA (approved in late 2000). One community contact noted there were no small business investment companies serving the Des Moines MSA. Several contacts stated qualified investment opportunities available during the evaluation period were mostly limited to occasional municipal bonds with a specific community development purpose.

## Appendix C: Tables of Performance Data

### Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) Purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As     .12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column with the appropriate caption, such as: “Statewide/Regional,” “Statewide/Regional with potential benefit to one or more AAs” or “Out of Assessment Area.” “Out of Assessment Area” is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Table 1. Lending Volume**

LENDING VOLUME		Geography: IOWA						Evaluation Period: January 1, 2004 to December 31, 2006				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Des Moines, IA MSA #19780	100%	2,257	299,237	539	133,655	0	0	64	16,547	2,860	449,439	100%

\* Loan Data as of December 31, 2006. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is May 25, 2004 to April 16, 2007.

\*\*\* Deposit Data as of December 31, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: IOWA								Evaluation Period: January 1, 2004 to December 31, 2006					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Des Moines, IA MSA #19780	1,668	100%	2%	3%	20%	12%	51%	51%	27%	34%	4%	6%	3%	4%	4%

\* Based on 2005 Peer Mortgage Data: Western Region.

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: IOWA								Evaluation Period: January 1, 2004 to December 31, 2006					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Owner Occ <sup>***</sup> Units	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Des Moines, IA MSA #19780	201	100%	2%	9%	20%	17%	51%	47%	27%	27%	3%	17%	3%	3%	3%

<sup>\*</sup> Based on 2005 Peer Mortgage Data: Western Region.

<sup>\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: IOWA								Evaluation Period: January 1, 2004 to December 31, 2006				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Des Moines, IA MSA #19780	388	100%	2%	4%	20%	14%	51%	43%	27%	39%	1%	3%	1%	1%	2%

\* Based on 2005 Peer Mortgage Data: Western Region.

\*\* Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2000 Census information.



**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: IOWA								Evaluation Period: January 1, 2004 to December 31, 2006					
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Des Moines, IA MSA #19780	539	100%	14%	22%	11%	7%	46%	41%	29%	30%	2%	4%	2%	2%	2%

\* Based on 2005 Peer Small Business Data: US.

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet 2006.

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: IOWA								Evaluation Period: January 1, 2004 to December 31, 2006					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Des Moines, IA MSA #19780	1,668	100%	17%	20%	19%	37%	25%	22%	39%	21%	4%	5%	6%	4%	4%

\* Based on 2005 Peer Mortgage Data: Western Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 1% of loans originated and purchased by Bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: IOWA								Evaluation Period: January 1, 2004 to December 31, 2006					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *				
	#	% of Total**	% Families **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Des Moines, IA MSA #19780	201	100%	17%	17%	19%	27%	25%	22%	39%	34%	3%	5%	3%	2%	3%

\* Based on 2005 Peer Mortgage Data: Western Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 9% of loans originated and purchased by Bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: IOWA				Evaluation Period: January 1, 2004 to December 31, 2006									
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *					
	#	% of Total**	% Families **	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Des Moines, IA MSA #19780	388	100%	17%	17%	19%	21%	25%	21%	39%	41%	1%	2%	1%	1%	2%	

\* Based on 2005 Peer Mortgage Data: Western Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 6% of loans originated and purchased by Bank.

\*\*\* Percentage of Families is based on the 20000 Census information.

\*\*\*\* Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: IOWA		Evaluation Period: January 1, 2004 to December 31, 2006				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 Million or Less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Revenues \$1 Million or Less
<b>Full Review:</b>									
Des Moines, IA MSA #19780	539	100%	61%	45%	43%	26%	31%	2%	2%

\* Based on 2005 Peer Small Business Data: US.

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2006).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 2% of small loans to businesses originated and purchased by the Bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: IOWA				Evaluation Period: May 25, 2004 to April 16, 2007			
MA/Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Des Moines, IA MSA #19780	4	1,765	23	2,589	27	4,354	63%	0	0
Statewide/Regional with Potential Benefit to Assessment Area	2	9	9	2,496	11	2,505	37%	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: IOWA																	
Evaluation Period: May 25, 2004 to April 16, 2007																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population Within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Des Moines, IA MSA #19780	100%	11	100%	18%	9%	64%	9%	3	0	NA	+3	NA	NA	5%	21%	48%	26%