



PUBLIC DISCLOSURE

December 31, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Capital One, National Association
Charter Number: 13688

1680 Capital One Drive
McLean, Virginia 22102

Office of the Comptroller of the Currency
Large Bank Supervision
Constitution Center
400 7th Street, S.W.
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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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General Information and Overall CRA Rating

General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution’s record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Capital One, National Association (CONA) issued by the OCC, the institution’s supervisory agency, for the evaluation period starting January 1, 2011 through December 31, 2013. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of Capital One, National Association with respect to the Lending, Investment, and Service Tests:

Performance Levels	Capital One, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
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:

- While the bank’s performance under the Lending Test, Investment Test and Service Test as noted in the above table would have been an Outstanding rating, the overall CRA rating was lowered from Outstanding to Satisfactory as discussed within the Fair Lending and Other Illegal Credit Practices section of this document;

- Excellent lending activity in all full-scope AAs;
- Excellent distribution of loans among geographies of different income levels in all full-scope AAs;
- Good distribution of loans among borrowers of different income levels within four full-scope AAs, including one of the largest rating areas. Adequate distribution of loans among borrowers of different income levels within the remaining five full-scope AAs;
- A significantly positive level of community development lending in all but one of the full-scope AAs;
- Product innovation and flexibility had a positive impact on the Lending Test;
- Excellent level of community development investments that were responsive to the AA needs in all full-scope AAs;
- In many of the bank's AAs, the bank took a leadership role in developing and participating in investments that were large, complex, and involved multiple partners with both public and private funding;
- Retail delivery systems in four of the bank's full-scope AAs, including all three primary rating areas, are accessible to geographies and individuals of different income levels, after considering branches in middle- and upper-income geographies (MUI) that are in close proximity to LMI geographies. Branch distributions are adequate in the remaining five full-scope AAs;
- The bank's record of opening and closing branch offices generally had a positive impact on its branch distributions;
- Overall hours do not vary in a way that inconveniences portions of the AAs, particularly LMI geographies. Branch hours are reasonably consistent across the AAs and any differences were reasonably explained; and
- CONA is a leader in providing community development services that are responsive to identified needs within four full-scope AAs, including the three largest rating areas. Service activity was good in two remaining full-scope AAs and adequate in the three other full-scope AAs.

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.

Benefit to Assessment Area: A qualified Community Development activity benefits the assessment area if (i) the activity benefits areas within the assessment area, or (ii) the activity benefits a broader statewide or regional area that includes the bank's assessment area. If a bank has adequately addressed the needs of its assessment area, then the OCC also considers activities submitted by the bank that benefit areas outside of its assessment area.

Census Tract (CT) – 2000 Census: 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.

Census Tract (CT) – 2010 Census: Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

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, size eligibility standards or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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 applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn), 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) – 2000 Census: 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.

Median Family Income (MFI) – 2010 Census: The median income derived from the United States Census Bureau's American Community Survey data every 5 years and used to determine the income level category of geographies. Also, it is the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level of individuals within a geography. For any given geography, 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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate 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 at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

Capital One, National Association (CONA) is an interstate bank headquartered in McLean, Virginia. CONA is a wholly owned subsidiary of Capital One Financial Corporation (COF), a \$297 billion multi-bank holding company also headquartered in McLean, Virginia. In addition to CONA, COF owns Capital One Bank (USA), National Association (COBNA), which offers primarily credit card products to consumers and small businesses. COBNA is designated as a limited purpose bank under CRA. At the request of bank management, COBNA's small loans to businesses and farms are considered in CONA's evaluation. Refer to Appendix A for a complete list of subsidiaries, affiliates, and products considered.

On February 17, 2012, COF completed the acquisition of ING Bank, fsb (ING) and merged it into CONA in November 2012. ING's products and services were primarily deposits and one-to-four family residential mortgages. ING had no branches, but operated in eight non-deposit taking locations ("cafes"), which CONA continues to operate. The cafes are located in California, Delaware, Hawaii, Illinois, Minnesota, New York, and Pennsylvania. Deposit-taking automated teller machines (ATMs) became operational in the cafes at the end of the evaluation period, and the AAs for the cafes went into effect in 2014. Consequently, the merger did not impact CONA's AAs for this evaluation. On May 1, 2012, COF acquired and merged HSBC Bank Nevada, N.A. (HSBC) domestic credit card portfolio into CONA. On November 1, 2013, COF acquired Beech Street Capital, a privately held, national originator and servicer of Federal National Mortgage Association (FNMA), Federal Home Loan Mortgage Corporation (FHLMC), and Federal Housing Authority (FHA) multifamily commercial real estate loans. The acquisition expands the bank's existing multifamily product offerings.

CONA offers a broad spectrum of financial products and services to consumers, small businesses, and commercial clients through a variety of channels. In addition to traditional loan and deposit products, CONA also provides personal and corporate trust services, personal financial services, access to mutual funds, cash management services, investment banking and capital markets products, international banking services, and investment management services.

CONA operates 908 retail banking branches and 1,817 ATMs at 1,143 locations in eight states and the District of Columbia. CONA's retail footprint includes branches in Connecticut, Delaware, the District of Columbia, Louisiana, Maryland, New Jersey, New York, Texas, and Virginia. The retail banking branches in Glen Allen and Richmond, Virginia primarily serve Capital One employees. CONA's three largest markets are in the New York City metro area, the Washington D.C. metro area, and New Orleans, Louisiana.

As of December 31, 2013, CONA reported total assets of \$238 billion, deposits of \$188 billion, and Tier One Capital of \$20 billion. Included in the deposits are approximately \$1.2 billion held in foreign offices and \$87 billion of Internet deposits that were located in the bank's AAs and across the country. These Internet deposits are housed in ING's former main office location in Wilmington, Delaware. Because there is no branch in Wilmington, Delaware and CONA tracks the geographic distribution of these deposits based on the depositor's address, the Internet deposits that were located within CONA's footprint were allocated to specific AAs ("allocated Internet deposits"). The Internet deposits that were located outside of CONA's designated AAs ("unallocated Internet deposits") were assigned to CONA's headquarters, which is located in

the Washington-Arlington-Alexandria AA. Our analysis reflects the dispersion of these Internet accounts and allocated Tier One Capital was adjusted accordingly.

As of December 31, 2013, CONA's net loans and leases were \$133 billion, representing 56 percent of total assets. The loan portfolio consists of approximately 45 percent real estate, 38 percent loans to individuals, 10 percent commercial loans, and the remaining 7 percent to other banks, non-depository institutions, states and U.S. political subdivisions and similar type entities. Farm and agricultural loans comprise a very small percentage of the loan portfolio.

CONA's investment strategy has been to focus most of its investments toward affordable housing, primarily using low-income housing tax credits (LIHTCs). LIHTCs deliver substantial impact to LMI individuals and communities in the form of affordable housing.

There are no known legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AAs.

CONA received an "Outstanding" rating at the previous CRA evaluation, dated April 4, 2011.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test is January 1, 2011 through December 31, 2013. Conclusions regarding the bank's lending performance are based on home purchase, home improvement, and home refinance mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses the bank reported under the Community Reinvestment Act (CRA). At the bank's request, we considered the small loans to business lending activities of COBNA, leases, and letters of credit to the extent the credit products revitalized communities or enhanced lending to LMI areas or borrowers. Retail services were evaluated from January 1, 2011 through December 31, 2013. The evaluation period for Community Development (CD) loans, investments, and services is January 1, 2011 through December 31, 2013. Please refer to Appendix A for information on the subsidiaries, affiliates and products reviewed during this evaluation.

CONA's volume of small loans to farms was insignificant, which precludes any meaningful analysis and conclusions. Small loans to farms are not part of the bank's strategic focus. Multifamily loans were evaluated for the New York-White Plains-Wayne AA for 2012/2013. Multifamily loans were insignificant for the remaining AAs, which precludes any meaningful analysis and conclusions. Multifamily loans meeting the definition of CD were evaluated under the CD lending criteria. Small loans to farms and multifamily loan data are presented in the tables in Appendix D for informational purposes.

The evaluation period includes demographic data from both the 2000 Census (data from calendar year 2011) and 2010 Census (data from calendar years 2012/2013). The 2010 Census resulted in changes in demographic data as well as new census tract (CT) income designations. Table 1 in Appendix D reflects the bank's lending volume from January 1, 2011 through December 31, 2013. Tables 2 through 12 in Appendix D reflect the data for 2012/2013, as this was determined to be the time period of greatest significance to evaluation conclusions and represented the substantial majority of lending activity over the evaluation period. Table 14 in Appendix D reflects investments from January 1, 2011 through December 31, 2013. Table 15 in Appendix D reflects retail branches as of December 31, 2013 and the branch openings and closing that occurred from January 1, 2011 through December 31, 2013. Branch opening and closings are reflected on Table 15 according to the census data that was in effect as of the date of the change. Changes in branch locations as a result of the 2010 Census changes are not reflected on the table.

Description of Evaluation Period

This evaluation period was marked with significant challenges for CONA, other financial institutions, and the United States economy in general. In June 2009, the country officially emerged from a deep recession (generally referred to as the "Great Recession"), which began in December 2007. However, growth in the U.S. economy faltered again in the first quarter of 2011 and was volatile throughout the exam period.

Mortgage rates declined throughout 2011 and 2012, reaching an all-time low in December 2012. Interest rates, although still considered historically low, spiked in June of 2013 and,

except for a dip in August, climbed throughout 2013. The housing market was disastrously impacted by the recession and mortgage meltdown and remained so throughout most of the evaluation period.

After significant declines during the Great Recession, changes in home prices ranged within a fairly narrow band for most of the exam period. The year 2013 brought about the first signs of increases in home prices above pre-recession values nationally. However, values began to decline in late 2013 and median home prices have still not returned to pre-recession peaks in many areas.

The economic conditions made it more difficult for LMI individuals to afford to purchase a home. LMI geographies were disproportionately affected, with higher unemployment rates and less demand for homes as individuals sought homes in MUI geographies due to the decline in home prices. The low interest rate environment spurred a boom in refinance activity that was primarily concentrated in MUI segments due to higher home equity levels. LMI geographies typically had a greater concentration of homes with negative equity.

The Great Recession also had a significantly negative impact on small business lending driven largely by declines in demand for credit. Businesses of all sizes restructured balance sheets, reduced leverage and remained cautious about increasing debt throughout the review period. Throughout the exam period, demand for business financing remained below forecasts as the economic recovery was considerably slower than anticipated. The volume of loans to small businesses has still not returned to pre-recession levels.

Data Integrity

Prior to the start of this evaluation, a statistical sample of HMDA and CRA loan files were selected and tested to determine the accuracy of the data. In addition, a sample of CD loans, investments, grants, and services were reviewed to ensure they met the regulatory definition for CD. We concluded the HMDA and CRA loan data and the CD loan, investment, grant, and service data submitted by management could be relied upon for this evaluation.

Selection of Areas for Full-Scope Review

CONA has defined 37 AAs within seven states and two multistate metropolitan areas (MMAs). We completed a full-scope review in one AA in each state or MMA in which CONA has an office. Full-scope reviews consider performance context, quantitative and qualitative factors. The area selected was typically the AA that contained the largest percentage of CONA deposits and/or loans within that state or MMA. Limited-scope reviews consider quantitative factors only. Refer to the "Description of Institution's Operations and Scope of Evaluation" section under each state and MMA rating section for details regarding how the areas were selected.

CONA added seven AAs in five states in the fourth quarter of 2013 following the acquisition of ING. Performance in those AAs was not considered in this evaluation because the AAs were added at the end of the review period with minimal activity to evaluate.

Ratings

In this evaluation, we placed more weight on the bank's performance in 2012/2013 than its performance in 2011 to reach our conclusions, as this was determined to be the time period of greatest significance to evaluation conclusions. The bank's overall rating is a blend of the MMA ratings and state ratings. Three primary rating areas carried the greatest weight in our overall conclusions. These areas represented the bank's most significant markets in terms of lending, deposits, and branch distribution. In order of significance, these areas were New York-Northern New Jersey-Long Island MMA, Washington-Arlington-Alexandria MMA, and the state of Louisiana. These three areas contain 91 percent of the bank's total allocated deposits, 64 percent of the bank's HMDA and CRA reportable loans during the entire evaluation period, and 76 percent of the branch network.

The MMA ratings and state ratings are based primarily on those areas that received full-scope reviews, but the bank's performance in areas receiving limited-scope reviews is also considered. Refer to the "Description of Institution's Operations and Scope of Evaluation" section under each state and MMA rating section for details regarding how the areas were emphasized in arriving at the respective ratings.

Community Contacts

OCC Community Affairs Officers updated or completed contacts in full-scope AAs for this evaluation. Interviews were conducted with a variety of community organizations including low-income housing agencies, small business development centers and social service and community action organizations serving primarily LMI persons. We also reviewed existing contacts made during the evaluation period with community groups, local government representatives, realtors, and business leaders within the various AAs as well as public comments received by the bank or the OCC. Information from these community contacts for the Primary Rating Areas is summarized, as needed, in the Market Profiles found in Appendix C.

Other Information

Assessment Areas (AAs) – We determined that all AAs consisted of whole geographies and met the requirements of the regulation. The areas reasonably reflected the different trade areas that the bank's branches could service and did not arbitrarily exclude any LMI areas.

Lending Gap Analysis – We reviewed summary reports and maps and analyzed CONA's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in any AA.

Inside/Outside Ratio – We considered the volume of loans made inside CONA's AAs a positive factor in our evaluation of lending performance. We analyzed the volume of bank loan originations and purchases within the bank's AAs versus those made outside the bank's AAs at the bank level. Our conclusions in this area were based solely on bank originations and purchases and did not include any affiliate data. At the bank level, 86.2 percent of all mortgage (85.9 percent home purchase, 91.4 percent of home improvement, and 84.2 percent

of refinancing) and 11 percent of small business loans were made within CONA's AAs. CONA's acquisition of the credit card portfolio from HSBC Bank Nevada (HSBC) skewed this percentage because the loans within the acquired portfolio reflected HSBC's business strategy, and, as a result, did not coincide with the bank's footprint. Excluding the HSBC acquired loans and the subsequent originations, the bank originated 86 percent of all small loans to businesses within the bank's AAs. Overall, we considered this performance to be good.

Flexible Loan Programs – The bank offers several flexible loan products that addressed the needs of LMI borrowers and geographies. In those areas where these flexible loan programs were given positive consideration, it is noted within the Lending Test of the respective AA. CONA has two flexible portfolio mortgage programs: DREAM and Community Home Buyers (CHB). During the evaluation period, CONA originated 182 DREAM loans totaling \$13.3 million and 306 CHB loans totaling \$59.7 million in its AAs. Other mortgage programs include a closing cost assistance program for refinances in the New York-White Plains-Wayne and the Washington-Arlington-Alexandria AAs; small unsecured home improvement loans (SUHILs) with a below market interest rate, targeted to LMI borrowers; and FHA and VA loans. During the evaluation period, CONA originated 1,119 FHA loans totaling \$241 million and 57 VA loans totaling \$21 million in its AAs.

For small businesses, the bank offers SBA loans and a "Second Look" program. CONA re-entered the SBA loan market in 2012 and offers SBA 7(a) loans, SBA 504 loans, SBA Express loans and lines of credit, and SBA Patriot Express loans and lines of credit. SBA loans have more flexible terms than conventional loans. During the evaluation period, CONA originated 167 SBA loans totaling \$21.2 million in its AAs. The bank also provides flexible financing to nonprofit developers, Community Development Financial Institutions (CDFIs), and other nonprofit entities to support affordable housing, economic development, and social services. During the evaluation period, the bank provided \$4 million in financing to six CDFI partners, and the CDFIs generated 143 loans totaling \$3.3 million to small businesses referred by CONA under its Second Look program (see more information about this program in the Service Test section below).

Description of Factors Considered Under Each Performance Test

Lending Test

Due to the changes in census data during the evaluation period, the bank's Lending Test performance was evaluated separately for 2011 and for 2012/2013. When arriving at overall conclusions, the 2012/2013 time period received greater weight based upon the lending volumes compared to volumes in 2011.

For the various loan products considered under the Lending Test, small loans to businesses received substantially greater weight than home mortgage loans in developing our conclusions. Business lending is the bank's primary lending strategy and accounts for a large majority of CONA's loans. Overall, within the mortgage loan category, home refinance lending was given greater weight, given the proportion of loans that were originated or purchased during the evaluation period.

We gave equal weight to the geographic and borrower distribution components of the Lending Test. In our analysis of the distribution of loans to geographies with different income levels, we gave greater consideration to the bank's performance in moderate-income geographies if there were a limited number of owner-occupied housing units or businesses in the low-income geographies. For borrower distribution, we considered the impact that income and poverty levels, housing costs and savings for downpayments limit housing opportunities for those individuals and families.

For 2012/2013, we analyzed the distribution of small loans to small businesses for each AA, as reflected on Table 11 in Appendix D. However, a substantial portion of the bank's reported small loans to businesses did not contain revenue information, as permitted under the CRA reporting requirements. Many of these were HSBC loans acquired by CONA and for which revenue data was not provided. We then analyzed the distribution of small loans to small businesses based on only those loans with revenue reported. Neither of these analyses provides a true representation of the bank's lending performance. In order to draw a more meaningful conclusion, we selected a statistically valid random sample of 60 loans reported without revenue for each full scope AA. We researched the revenue for the businesses in the sample through independent resources and the bank's loan documents. We then performed a borrower distribution analysis based on the results of the loan sample. The results of the sample received the most weight when arriving at the overall conclusion for the distribution of loans to businesses of different sizes, as this was determined to be the most reflective of the bank's performance.

For the geographic and borrower distribution analyses, lending market share data is presented for 2012. Market share data for small loans to businesses includes all loans and may not reflect the bank's actual performance in serving small businesses. Market share data for 2013 was not available at the time of our analysis.

The volume of CD loans and the degree of responsiveness of those loans to the needs in the community were considered in the lending evaluation. We compared the dollar amount of CD loans to the Tier One Capital allocated to the AAs to gain a perspective regarding the volume of CD lending activity. Tier One Capital was allocated to the rating areas and AAs based on the percentage of bank deposits that were either maintained in or allocated to the rating areas and AAs.

We did not analyze or draw conclusions on a particular loan product if less than fifty loans were made in an AA during the evaluation period. Generally, we found that analysis on fewer than fifty loans did not provide meaningful conclusions.

Investment Test

We considered the volume of qualified investments made during the current evaluation period and investments that were made prior to the current evaluation period, but are still outstanding. The amount of consideration given to the current and prior period investments is based on the responsiveness of the investments to the needs in the AAs. Investments made in CONA's broader regional areas that include the bank's AAs were also considered. Qualitative factors, such as complexity and innovation, were considered.

We compared the dollar amount of qualified investments made in the current evaluation period and prior evaluation periods to the Tier One Capital allocated to the AAs to gain a perspective regarding the volume of investment activity. Tier One Capital was allocated to the rating areas and AAs based on the percentage of bank deposits that were either maintained in or the Internet deposits that were allocated to the rating areas and AAs.

Service Test

Primary consideration was given to CONA's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in LMI geographies, but also considered branches in MUI geographies that border LMI geographies or are adjacent to and within one-half mile in proximity of LMI geographies. Our evaluation of the proximity of these branches included consideration of available and affordable public transit systems within the assessment areas, and the absence of physical barriers, such as water or highways, that might obstruct convenient access to the branch. Our analysis took into consideration the impact the CT income designation changes had on the overall branch distribution.

We evaluated the range of services and products offered by all of the bank's branches. Services and products offered at branches are consistent throughout the branch network. We specifically focused on any differences in branch hours and services in LMI geographies compared to those in MUI geographies.

Where CONA opened or closed branches within an AA, the overall impact of the change was evaluated based on the census data that was in effect as of the date of the change. If no branches were opened or closed in an AA, we did not include that performance element in our analysis.

CONA offers a variety of alternative delivery systems, including full-service ATMs, telephone, mobile, and online banking. These services are offered to all bank customers, are available throughout all of the bank's markets and give customers flexibility in choosing services that fit their needs. Online and mobile banking has become an effective delivery method allowing customers to access their accounts anytime from any location with the right equipment. During the evaluation period, consumer access to digital channels had a measurable impact on the role that brick and mortar branches play in delivering banking services to the public. In a two-year period, CONA measured a significant decline in in-branch teller transactions.

The bank tracked the number of times that an account in LMI geographies used an alternative delivery system, allowing us to determine their effectiveness in LMI geographies. The bank's 2012 internal data indicates that more than half the customers living in LMI geographies in the bank's AAs used an ATM, more than two-fifths used telephone banking, about one-fifth used online banking, and more than one quarter used mobile banking. The use of alternative delivery systems by accounts in LMI areas was generally higher than the activity from accounts in MUI geographies for ATMs and telephone banking and only slightly lower for online and mobile banking. We also analyzed the distribution of proprietary full-service deposit-taking ATMs by the income level of the CT. The bank's alternative delivery systems for delivering retail banking services in LMI geographies and to LMI individuals was considered

in our evaluation. Alternative delivery systems provided additional availability and were effective for delivering retail banking services.

The bank's record of providing CD services was evaluated in AAs that received full-scope reviews. Our primary consideration in these reviews was the responsiveness to the needs of the community. CONA offers several innovative CD services that benefit multiple AAs. The following highlights some examples of the bank's programs:

- CONA's flagship "Getting Down to Business" program is an innovative technical assistance training program for small businesses. This is a seven-month program featuring a multi-course, in-depth curriculum that addresses the core needs of small businesses. Workshops cover topics such as business plans, marketing, credit, savings, accounting practices, legal issues, and networking. Each participant is paired with a CONA banker, a financial advisor, and a business coach. This program is offered in four of the bank's AAs and is highly responsive to the need for small business development and job creation.
- CONA has a "Second Look" program that aids emerging small businesses that are not yet bankable. Through this flexible program, small business loan applicants who are declined because they do not meet the bank's underwriting guidelines are referred to CDFI partners for a "second look." These alternative lenders provide the referred businesses with technical assistance and possible financing. The bank also lends to these CDFIs to enable them to provide financing to these small businesses.
- CONA operates four student-run bank branches in high schools serving LMI students. Two are in the bank's New York-White Plains-Wayne AA, one is in the Newark AA, and one is in the Washington-Arlington-Alexandria AA. Student bankers are hired by the bank, receive training, obtain hands-on experience as tellers and customer service representatives, and teach other students the importance of budgeting and saving. This innovative program teaches the student bankers the responsibilities of employment and is responsive to the need for comprehensive financial education in public schools serving LMI students.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c) and 195.28(c), in determining a national bank's (bank) or federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau.

The OCC identified the following public information regarding non-compliance with the statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution:

- Noncompliance with the Servicemembers Civil Relief Act ("SCRA") and the deficiencies in the Bank's program for compliance with the SCRA. CONA and CONA's affiliate, Capital One Bank (USA), National Association (COBNA), entered into Consent Orders with the OCC on July 25, 2012 and the OCC assessed a Civil Money Penalty of \$4 million. Additionally, CONA and COBNA entered into a Consent Order with the United States Department of Justice (DOJ) on July 27, 2012 and the DOJ assessed a Civil Money Penalty of \$55 thousand. In connection with the Consent Order, CONA and COBNA agreed to pay approximately \$12 million to resolve the lawsuit by the DOJ. CONA issued 3,741 checks, totaling approximately \$4.4 million in restitution. Collectively, CONA and COBNA issued 43,725 checks, totaling approximately \$12.6 million to resolve the lawsuit by the DOJ. For further information, see OCC Enforcement Actions #2012-155 and #2014-144 and DOJ Civil Action No 1:12-cv-00828 (JCC-IDD).

The OCC does not have additional public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

As a result of these findings, the CRA Performance Evaluation rating was lowered from Outstanding to Satisfactory.

The OCC will consider any evidence of discriminatory or other illegal credit practices relative to this institution that other regulators may provide to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information provided concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Primary Rating Areas

- New York-Northern New Jersey-Long Island Multistate MSA
- Washington-Arlington-Alexandria Multistate MSA
- State of Louisiana

New York-Northern New Jersey-Long Island MMA

CRA rating for the New York-Northern New Jersey-Long Island MMA¹: Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent lending activity;
- Excellent geographic distribution of loans;
- A significantly positive level of CD loans was originated;
- CONA's use of flexible products had a positive impact on the Lending Test;
- Excellent level of CD investments that were responsive to AA needs;
- Retail delivery systems are accessible to geographies and individuals of different income levels, after considering branches in MUI geographies that are in close proximity to LMI geographies; and
- CONA is a leader in providing CD services that are responsive to the needs of the bank's AA.

Description of Institution's Operations and Scope of Evaluation in the New York-Northern New Jersey-Long Island MMA

CONA's operations in the New York-Northern New Jersey-Long Island MMA consist of four AAs: New York-White Plains-Wayne AA (all counties in the New York-White Plains-Wayne MD, excluding Putnam County), Edison AA (entire MD), Nassau-Suffolk AA (entire MD), and Newark AA (excludes Hunterdon and Sussex counties).

Based on the June 30, 2013 FDIC Summary of Deposit Market Share report, CONA's deposits in the MMA totaled \$47.5 billion (excluding allocated Internet deposits), representing 25.2 percent of the bank's total domestic deposits. In terms of deposit market share, CONA ranks sixth with a 3.8 percent share compared to 35 percent for JPMorgan Chase, the largest financial institution in the MMA. There are 215 FDIC insured depository institutions in the rating area, providing strong competition for the bank. CONA operates 331 branches within

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

the MMA. There are 185 branches in the New York-White Plains-Wayne AA, 15 branches in the Edison AA, 114 branches in the Nassau-Suffolk AA, and 17 branches in the Newark AA.

In evaluating the MMA, we conducted a full-scope review of the New York-White Plains-Wayne AA, as this AA accounted for 57 percent of the bank's deposits, 53 percent of the loans, and 56 percent of the branches in the MMA. We evaluated all home mortgage products, including multifamily loans, and small loans to businesses for the New York-White Plains-Wayne AA. Limited-scope reviews were conducted for the Edison, Nassau-Suffolk, and Newark AAs.

In evaluating the bank's performance, we considered the significant affordability barriers that exist in the metropolitan New York City housing market. Although the economic downturn has impacted the market, home prices remain fairly strong. In 2013, the median home price in the New York-White Plains-Wayne AA was \$465.7 thousand.

In October 2012, Hurricane Sandy swept up through the East Coast of the United States and made landfall near Atlantic City, New Jersey. This was the deadliest and most destructive hurricane of the 2012 Atlantic hurricane season, as well as the second costliest hurricane in the United States history. In New Jersey, the storm left streets flooded, thousands homeless and millions without power. In New York City, the New York Stock Exchange closed, airports closed, subway and train services were suspended, water flooded subways, businesses, and tunnels and millions of businesses and households were without electric power. CONA made a multi-faceted response to support the northeast region's recovery and partnered with local, statewide, and national nonprofits and government agencies to facilitate and expedite relief efforts. Some of CONA's efforts included \$5.7 million in loans to support the recovery of nonprofits and small businesses and over \$2 million in grants to government agencies and nonprofits, and special programs. Additionally, CONA provided assistance at the customer level, including (a) proactive waiver of fees, (b) suspension of evictions, auto repossessions, foreclosure sales and collection activities, (c) assistance with insurance claims and (d) coverage of re-inspection fees on pending mortgage applications.

Refer to the market profile for the New York-Northern New Jersey-Long Island MMA in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the New York-Northern New Jersey-Long Island MMA is rated outstanding. Based on a full-scope review, the bank's performance in the New York-White Plains-Wayne AA is excellent.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the New York-Northern New Jersey-Long Island MMA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the New York-White Plains-Wayne AA is excellent. Within the AA, 96 percent of the bank's loans were small loans to businesses and four percent were mortgage loans. There is strong competition in the market for all types of loans, and CONA's market shares clearly reflect its lending strategy.

Based on the June 30, 2013 FDIC Summary of Deposit Market Share report, the bank ranks seventh in deposits with a 2.7 percent deposit market share. For small loans to businesses, the bank ranks third with a 9.6 percent market share. The two lenders ahead of CONA are nationwide credit card lenders with market shares of 42 percent and 20 percent, respectively. There were 222 lenders in the market.

In overall home mortgage lending, CONA ranked 22nd with a 0.64 percent market share. For home purchase lending, the bank ranked 39th with a 0.43 percent market share. For home improvement lending, the bank ranked ninth with a 2.3 percent market share, and for home refinancing, the bank ranked 19th with a 0.69 percent market share.

The mortgage lending market shares are skewed when compared to the deposit market shares based on the number of lenders and depository institutions. In this AA, there is strong competition for home mortgage lending. There are 661 lenders, many without a depository presence. In contrast, there are 160 depository institutions in the AA.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is excellent. This is based on excellent distribution of both home mortgage loans and small loans to businesses.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the New York-Northern New Jersey-Long Island MMA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage lending in the New York-White Plains-Wayne AA is excellent.

The bank's geographic distribution of home purchase loans for 2012/2013 is excellent. The bank's percentage of home purchase loans in both LMI geographies significantly exceeded the percentage of owner-occupied units in those geographies. The bank's market share in LMI geographies equaled or exceeded the bank's overall market share. Performance for 2011 was not inconsistent with the distribution for 2012/2013.

The bank's geographic distribution of home improvement loans for 2012/2013 is excellent. The bank's percentage of home improvement loans in both LMI geographies significantly exceeded the percentage of owner-occupied units in those geographies. Although the bank did not have any market share in low-income geographies in 2012, the bank's market share in moderate-income geographies exceeded the bank's overall market share. In 2011, the bank's market share in both LMI geographies significantly exceeded the bank's overall market share. Performance for 2011 was not inconsistent with the distribution for 2012/2013.

The bank's geographic distribution of home refinance loans for 2012/2013 is excellent. The percentage of refinance loans in both LMI geographies exceeded the percentage of owner-occupied units in those geographies. The bank's market share in both LMI geographies exceeded the bank's overall market share. Performance for 2011 was not inconsistent with the distribution for 2012/2013.

The bank's geographic distribution of multifamily loans for 2012/2013 is excellent. The bank originated 73 multifamily loans during this portion of the evaluation period. The percentage of loans made in both LMI geographies exceeded the percentage of multifamily units in those geographies. The bank's market share in low-income geographies exceeded and in moderate-income geographies met the bank's overall market share. The limited volume of multifamily lending in 2011 was not meaningful for an analysis.

Small Loans to Businesses

Refer to Table 6 in the New York-Northern New Jersey-Long Island MMA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses in the New York-White Plains-Wayne AA is excellent. During 2012/2013, the portion of small loans to businesses in LMI geographies exceeded the percentage of businesses within these geographies. The bank's market share in both LMI geographies exceeded its overall market share. Performance in 2011 was not inconsistent with the distribution in 2012/2013.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of the borrower is adequate. This is based on excellent distribution of home mortgage lending and adequate distribution of small loans to businesses.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the New York-Northern New Jersey-Long Island MMA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income in the New York-White Plains-Wayne AA is excellent, after considering the impact from competition, the high cost of housing, income and poverty level, and unemployment in the New York-White Plains-Wayne AA during the evaluation period. Despite the real estate and economic downturn affecting the U.S. during the evaluation period, economic data shows that the median sales price of existing single-family homes in this AA remained strong. The median single-family housing value for the New York-White Plains-Wayne MD was approximately \$465 thousand in 2013. Coupled with a poverty level of 16 percent (and significantly higher in some of the counties/geographies within the AA) of the households in the AA and a higher than average unemployment rate, homeownership remains very difficult for most LMI borrowers. The 2013 FFIEC median family

income for the AA indicates that a low-income family earns no more than \$33 thousand a year and a moderate-income borrower earns no more than \$53 thousand a year.

The borrower distribution of home purchase loans for 2012/2013 is good, after considering the challenges described above. Although the percentage of home purchase loans to low-income borrowers was well below the percentage of such families, the bank's performance to these borrowers is considered adequate. This offset the excellent performance found with moderate-income borrowers. The percentage of home purchase loans to moderate-income borrowers exceeded the percentage of such families. The bank's market share to both LMI borrowers exceeded the bank's overall market share. Performance in 2011 is not inconsistent with the distribution in 2012/2013.

The borrower distribution of home improvement loans for 2012/2013 is excellent. Although the percentage of home improvement loans to low-income borrowers was below the percentage of such families, the bank's performance to these borrowers is considered good in light of the issues described above. The percentage of home improvement loans to moderate-income borrowers exceeded the percentage of such families. The bank's market share to both LMI borrowers exceeded the bank's overall market share. Performance in 2011 is not inconsistent with the distribution in 2012/2013.

The borrower distribution of home refinance loans for 2012/2013 is excellent. Although the percentage of home refinance loans to low-income borrowers was below the percentage of such families, the bank's performance to these borrowers is considered good in light of the performance context described above. The percentage of home refinance loans to moderate-income borrowers exceeded the percentage of such families. The bank's market share to both LMI borrowers significantly exceeded the bank's overall market share. The good performance to low-income borrowers, when combined with excellent performance to moderate-income borrowers and overall excellent market share performance to borrowers in both LMI categories, resulted in our conclusion of excellent performance. Performance in 2011 was slightly weaker than the distribution in 2012/2013 and considered good. Performance in 2011 did not impact the rating.

Small Loans to Businesses

The overall distribution of loans to businesses of different sizes in the New York-White Plains-Wayne AA is adequate. For 2012/2013, the data in Table 11 in the New York-Northern New Jersey-Long Island MMA section of Appendix D shows the percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) was well below the percentage of small businesses. However, revenue was not reported for approximately 60 percent of the small loans to businesses. Many of these were HSBC loans acquired by CONA and for which revenue data was not provided or credit cards for which business revenue is not considered in the underwriting. When considering only the 40 percent of loans with revenue reported, the percentage of small loans to small businesses (85 percent) exceeded the percentage of small businesses (72 percent). Because neither of these analyses provides a true representation of the bank's lending performance, we selected a statistically valid random sample of 60 loans without revenue reported in this AA and performed a borrower distribution based on the results of the sample. For this AA, 35 of the 60 loans (58 percent) in the sample were to businesses with gross annual revenues of \$1 million or less. This percentage (58

percent) was below the percentage of small businesses (72 percent) and considered adequate. The bank's market share to small businesses is below the bank's overall market share. Performance in 2011 was not inconsistent with the distribution in 2012/2013 and is considered adequate.

Community Development Lending

Refer to Table 1 Lending Volume in the New York-Northern New Jersey-Long Island MMA section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD, however.

A significantly positive level of CD loans was originated. The bank originated 239 loans totaling \$1.46 billion that were responsive to AA credit needs. This volume represents 38 percent of allocated Tier One Capital. A large majority of the loans addressed the need for creating or preserving affordable housing, including rental housing, for LMI individuals. This is a critical need within the AA.

An example of one such development included \$29.2 million in loans, including \$6.7 million in New Markets Tax Credits (NMTC), to finance a new mixed-use development in a moderate-income geography in West Harlem. The development contains 124 residential units, all for LMI households, including 25 units for formerly homeless families. It also includes a children's museum, a day care facility, and space for a nonprofit provider of social services. CONA was the lead bank for this complex transaction, which involved several additional sources of financing including funds from the City of New York and grants from the Federal Home Loan Bank of New York and several private and community foundations. Part of the bank's debt financing consisted of a bridge loan during construction in order to facilitate the closings of the LIHTC and NMTC transactions.

Product Innovation and Flexibility

The bank's use of flexible loan products had a positive impact on the Lending Test. During the evaluation period, the bank originated 72 FHA loans totaling \$24.4 million, 138 CHB loans, 20 Closing Cost Assistance Program (CCAP) loans, and 74 SUHILs totaling over \$32 million. The CCAP loans involved \$93 thousand in incentives provided by the bank. CONA also originated 27 SBA loans totaling \$5.6 million and referred 54 small businesses to CDFIs during the evaluation period.

Other Loan Data

The state of New York and the City of New York require that four percent LIHTC developments funded with tax-exempt bonds utilize a credit enhancement structure involving a letter of credit (LC). CONA's participation in many four percent LIHTC developments in the AA resulted in 26 LCs totaling \$372.7 million with a CD purpose. The following is an example that illustrates the complexity and responsiveness of CONA's CD LCs:

- CONA provided a \$26.6 million LC to enhance tax-exempt bonds issued by the City to transform a municipal parking lot into a community hub containing a mix of affordable housing, retail and community space. The development, located in a low-income CT, has 143 units of affordable housing for LMI families. CONA also made a \$20.6 million LIHTC investment to finance the development. Other sources of financing included \$16 million in loans from the City and \$18.5 million in additional LIHTC equity from another investor.

Refer to Table 1 Other Products in the New York-Northern New Jersey-Long Island MMA section of Appendix D for data on these LCs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Edison, Nassau-Suffolk, and Newark AAs is not inconsistent with the bank's overall outstanding performance under the Lending Test in the New York-White Plains-Wayne AA. CONA's performance in the limited-scope areas did not impact the overall Lending Test rating in the MMA. Refer to Tables 1 through 12 in the New York-Northern New Jersey-Long Island MMA section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in New York-Northern New Jersey-Long Island MMA is rated outstanding. Based on a full-scope review, the bank's performance in the New York-White Plains-Wayne AA is excellent.

Refer to Table 14 in the New York-Northern New Jersey-Long Island MMA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

CONA has an excellent level of qualified investments and makes extensive use of innovative and/or complex investments to support CD initiatives. CONA originated 786 qualified investments totaling \$399 million. Additionally, 77 prior period investments totaling \$357 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period investment dollar volume represents 19.7 percent of the bank's allocated Tier One Capital. The volume of current period investments is significant and the volume of prior period investments that remain outstanding is substantial .

The bank's responsiveness to the CD needs in the AA is excellent. A substantial majority of the dollar volume of the bank's current and prior period investment transactions is LIHTCs and focuses on affordable housing, a primary credit need in the AA. Grants were made to a variety of organizations that support affordable housing or community services targeted to LMI individuals, small business development, or revitalization and stabilization of LMI geographies.

One example that demonstrates the bank's use of complex investments and the bank's significant responsiveness was in 2012. CONA participated in the largest affordable housing financing transaction closed in the United States. The bank provided a \$40.5 million LIHTC

investment and a \$55.7 million participation in a \$157 million LC to finance the renovation of four blighted high-rise residential buildings located in an LMI area. The buildings contain 1,654 units of affordable housing. Preserving and improving the buildings helped bring into service 285 non-operational units, which added to the housing supply immediately after Hurricane Sandy directly damaged this area. The buildings provide long-term affordability and 90 percent of the units are set aside for persons at 60 percent or below of the median area income.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, CONA's performance under the Investment Test in the Newark and Edison AAs is not inconsistent with the bank's overall outstanding performance under the Investment Test in the New York-White Plains-Wayne AA. In the Nassau-Suffolk AA, CONA's performance is weaker than the bank's overall outstanding performance under the Investment Test in the New York-White Plains-Wayne AA, but is considered good. The weaker performance is due to a lower level of investments relative to the bank's operations in the AA. CONA's performance in the limited-scope areas did not impact the overall Investment Test rating in the MMA. Refer to Table 14 in the New York-Northern New Jersey-Long Island MMA section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the New York-Northern New Jersey-Long Island MMA is rated high satisfactory. Based on a full-scope review, the bank's performance in the New York-White Plains-Wayne AA is good.

Retail Banking Services

Refer to Table 15 in the New York-Northern New Jersey-Long Island MMA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Retail delivery systems are accessible to geographies and individuals of different income levels, after considering branches in MUI geographies that are in close proximity to LMI geographies. There are 185 branches within the New York-White Plains-Wayne AA. Three branches are located in geographies with no income designation. CONA's branch distribution was impacted by the 2010 Census changes. Specifically, six branches that were located in LMI CTs based on the 2000 Census are no longer located in LMI CTs based on the 2010 Census. The percentage of the bank's branches located in low-income geographies is well below the percentage of the population residing in those geographies. The percentage of the bank's branches located in moderate-income geographies is near to the percentage of the population residing in those geographies. However, the bank has 33 branches in MUI geographies that border LMI geographies or are adjacent and within one-half mile or less in proximity to LMI geographies. After considering these branches, accessibility improves and is considered good. CONA's alternative delivery systems, including ATMs, online and mobile banking, and phone banking services, were effective and provide additional delivery system

availability and access to retail banking services. The distribution of deposit-taking ATMs is not inconsistent with the branch distribution. The bank's branch distribution performance in 2011 was not inconsistent with the distribution in 2012/2013.

CONA's record of opening and closing branches did not materially affect the accessibility of its delivery systems in the AA, particularly in LMI geographies. During the evaluation period, the bank opened one branch in a low-income geography, one branch in a moderate-income geography (this tract was reclassified to a middle-income geography with the 2010 Census changes), and two branches in upper-income geographies. The bank closed eight branches in MUI geographies and no branches in LMI geographies.

Branch hours and services do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. Branch hours are generally 9:00 a.m. to 6:00 p.m. Most branches are open Saturday and five branches are open Sunday, including three branches in LMI geographies.

Community Development Services

CONA is a leader in providing CD services that are responsive to the identified needs in the AA. Bank employees provided more than 11 thousand hours of service to 122 organizations in the AA that meet the definition of CD. This includes 19 employees who served in leadership roles as Board or committee members for 21 of the organizations. A majority of the services related to financial education and to organizations that focus on community services or affordable housing targeted to LMI individuals and economic development. The following is an example of a CD service:

- A CONA associate serves as a Board member for a nonprofit organization that provides low-income women with the training, funding, and support they need to start businesses. The organization's training program runs for 11 weeks, is offered in English and Spanish, and provides technical business training. In addition to the associate serving on the Board, other CONA associates provide business training and assist participants with developing a business plan. These activities are responsive to the need for technical assistance for small and micro-businesses in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Edison AA is not inconsistent with the bank's overall high satisfactory performance under the Service Test in the New York-White Plains-Wayne AA. In the Nassau-Suffolk and Newark AAs, the bank's performance is weaker than the bank's overall high satisfactory performance under the Service Test in the New York-White Plains-Wayne AA and is considered adequate. The weaker performance is due to weaker branch distributions. CONA's performance in the limited-scope areas did not impact the overall Service Test rating in the New York-Northern New Jersey-Long Island MMA. Refer to Table 15 in the New York-Northern New Jersey-Long Island MMA section of Appendix D for the facts and data that support these conclusions.

Washington-Arlington-Alexandria MMA

CRA rating for the Washington-Arlington-Alexandria MMA²: Outstanding

The lending test is rated: Outstanding

The investment test is rated: Outstanding

The service test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent lending activity;
- Excellent geographic distribution of loans;
- A significantly positive level of CD loans was originated;
- CONA's use of flexible products had a positive impact on the Lending Test;
- Excellent level of CD investments that were responsive to AA needs;
- Retail delivery systems are accessible to geographies and individuals of different income levels, after considering branches in MUI geographies that are in close proximity to LMI geographies; and
- CONA is a leader in providing CD services that are responsive to the needs of the bank's AA.

Description of Institution's Operations and Scope of Evaluation in the Washington-Arlington-Alexandria MMA

CONA's operations in the Washington-Arlington-Alexandria MMA consist of two AAs: the Washington-Arlington-Alexandria AA (all counties in the Washington-Arlington-Alexandria MD, excluding Clarke County in Virginia and Jefferson County in West Virginia) and the Bethesda AA (Montgomery and Frederick counties).

Based on the June 30, 2013 FDIC Summary of Deposit Market Share report, CONA's deposits in the MMA totaled \$22.1 billion (excluding allocated and unallocated Internet deposits), representing 11.8 percent of the bank's total domestic deposits. In terms of deposit market share, CONA ranks third with an 11.8 percent deposit market share, behind E*TRADE Bank with 16.9 percent and Wells Fargo Bank with 12.6 percent. CONA operates 189 branches in the MMA, including 126 in the Washington-Arlington-Alexandria AA and 63 in the Bethesda AA. There are 88 FDIC insured depository institutions in the MMA, providing strong competition for the bank.

² This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

In evaluating the MMA, we conducted a full-scope review of the Washington-Arlington-Alexandria AA, as this AA accounted for 70 percent of the bank's total deposits when excluding the allocated and unallocated Internet deposits assigned to this AA, 91 percent of the bank's deposits when including allocated and unallocated Internet deposits assigned to this AA, 71 percent of the loans, and 67 percent of the branches in the MMA.

In evaluating CD lending and investments for the Washington-Arlington-Alexandria AA, we took into consideration the significant portion of unallocated Internet deposits that were assigned to CONA's headquarters, which is located in this AA. To provide perspective regarding the relative level of CD lending and investments in each AA, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits as a means of comparative analysis. Because the unallocated Internet deposits cause a significant increase to the resulting capital base in the Washington-Arlington-Alexandria AA, we evaluated CD lending and investments as a percentage of Tier One Capital with and then without the unallocated Internet deposits. A limited-scope review was conducted for the Bethesda AA.

Refer to the market profile for the Washington-Arlington-Alexandria MMA in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the Washington-Arlington-Alexandria MMA is rated outstanding. Based on a full-scope review, the bank's performance in the Washington-Arlington-Alexandria AA is excellent.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the Washington-Arlington-Alexandria MMA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Washington-Arlington-Alexandria AA is excellent. Within the AA, 85 percent of the bank's loans were small loans to businesses and 15 percent were home mortgage loans. There is strong competition in the market for all types of loans, and CONA's market shares clearly reflect its lending strategy.

Based on the June 30, 2013 FDIC Summary of Deposit Market Share report, the bank ranks fourth in deposits with a 10.2 percent deposit market share. For small loans to businesses, the bank ranks second with a 15.1 percent market share. The lender ahead of CONA is a nationwide credit card lender with a market share of 36.4 percent. There were 139 lenders in the market.

In overall home mortgage lending, CONA ranked 25th with a 0.69 percent market share. For home purchase lending, the bank ranked 69th with a 0.20 percent market share. For home improvement lending, the bank ranked 21st with a 0.83 percent market share, and for home refinancing, the bank ranked 21st with a 0.88 percent market share.

Similar to the New York City metropolitan market, mortgage lending is very competitive in this AA and lending market shares are skewed in relationship to deposit market share. There were over 700 lenders, many without a depository presence. There were 78 depository institutions in the Washington-Arlington-Alexandria AA.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is excellent. This is based on excellent distribution of both home mortgage loans and small loans to businesses.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the Washington-Arlington-Alexandria MMA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage lending in the Washington-Arlington-Alexandria AA is excellent. The geographic distribution of all home mortgage products for 2012/2013 is excellent. For home purchase and home refinance loans, the distribution of loans in LMI geographies for 2012/2013 exceeded the percentage of owner-occupied units in those geographies. The bank's percentage of home improvement loans in low-income geographies was near to the percentage of owner-occupied units in those geographies. The bank's percentage of home improvement loans in moderate-income geographies exceeds the percentage of owner-occupied units in those geographies. The bank's market share in both LMI geographies exceeded the bank's overall market share for all products. Performance for 2011 was not inconsistent with the distribution for 2012/2013.

Small Loans to Businesses

Refer to Table 6 in the Washington-Arlington-Alexandria MMA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses in the Washington-Arlington-Alexandria AA is excellent. During 2012/2013, the portion of small loans to businesses in LMI geographies exceeded the percentage of businesses within these geographies. The bank's market share in both LMI geographies exceeds its overall market share. Performance in 2011 was not inconsistent with the distribution in 2012/2013.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of the borrower is adequate. This is based on excellent distribution of home mortgage lending and adequate distribution of small loans to businesses.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the Washington-Arlington-Alexandria MMA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income in the Washington-Arlington-Alexandria AA is excellent.

The borrower distribution of home purchase loans for 2012/2013 is excellent. The percentage of loans to low-income borrowers met and to moderate-income borrowers exceeded the percentage of such families. The bank's overall market share is very low. However, the bank's market share for both LMI borrowers exceeded the bank's overall market share.

The borrower distribution of home improvement and home refinance loans for 2012/2013 is excellent. The percentage of home improvement loans to low-income borrowers was near to, and the percentage of home refinance loans to low-income borrowers is below the percentage of such families. For both products, the percentage of loans to moderate-income borrowers exceeded the percentage of such families. The bank's market share to LMI borrowers exceeded the bank's overall market share.

Performance for all three products in 2011 was not inconsistent with the distribution for 2012/2013.

Small Loans to Businesses

The overall distribution of loans to businesses of different sizes in the Washington-Arlington-Alexandria AA is adequate. For 2012/2013, the data in Table 11 in the Washington-Arlington-Alexandria MMA section of Appendix D shows the percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) was well below the percentage of small business. However, revenue was not reported for approximately 49 percent of the small loans to businesses. Many of these were HSBC loans acquired by CONA and for which revenue data was not provided or credit cards for which business revenue is not considered in the underwriting. When considering only the 51 percent of loans with revenue reported, the percentage of small loans to small businesses (88 percent) exceeded the percentage of small businesses (71 percent). Because neither of these analyses provides a true representation of the bank's lending performance, we selected a statistically valid random sample of 60 loans without revenue reported in this AA and performed a borrower distribution based on the results of the sample. For this AA, 32 of the 60 loans (53 percent) in the sample were to businesses with gross annual revenues of \$1 million or less. This percentage (53 percent) was below the percentage of small businesses (71 percent) and considered adequate. The bank's market share to small businesses is below the bank's overall market share. Performance in 2011 is stronger than in 2012/2013 and considered good. The stronger performance is due to the bank's good distribution of loans to businesses of different sizes and the bank's excellent market share.

Community Development Lending

Refer to Table 1 Lending Volume in the Washington-Arlington-Alexandria MMA section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

The bank originated a significantly positive level of CD loans, after considering the significant portion of unallocated Internet deposits in this AA and the strong competition in the AA. CONA originated 52 loans totaling \$385.6 million that were responsive to AA credit needs. A majority of the loans were responsive to the most critical community need, which is creating or preserving affordable housing, including rental housing, for LMI individuals.

An example of one such development included a loan of \$11.6 million to help finance the rehabilitation of 119 rental units in five residential buildings located in a low-income geography in Washington DC. Almost 60 percent of the units were vacant prior to rehabilitation. When completed, all 119 units will be set aside for LMI households. Additionally, CONA received an Affordable Housing Program award of \$500 thousand from the FHLB of Atlanta for this development. This complex transaction involved additional sources of funding, including Neighborhood Stabilization Program loans, a loan from the DC government, and LIHTC equity from another investor.

Product Innovation and Flexibility

Flexible or innovative loan programs had a positive impact on the Lending Test. During the evaluation period, CONA originated 17 CHB and 154 CCAP loans totaling \$35.6 million. The bank also provided a total of \$744 thousand in closing cost incentives on the CCAP loans. In addition, CONA originated 165 FHA loans totaling \$47 million, 40 VA loans totaling \$15 million and 14 SBA loans totaling \$3.2 million. The bank referred 49 small businesses to CDFIs during the evaluation period as part of the Second Look program.

Other Loan Data

In addition to CD loans, the bank issued six LCs for \$19.2 million in the AA that have a CD purpose. The following is an example that illustrates the complexity and responsiveness of CONA's CD LCs:

- CONA issued a \$5.2 million LC to help finance the conversion of a former school building into 82 rental units for seniors in Washington DC. Seventy-eight of the units will be reserved for LMI households, including 17 units for households with incomes not exceeding 30 percent of AMI. A community development corporation and two other organizations that focus on developing affordable housing and community revitalization are redeveloping the property. Additional sources of funding included a \$7 million bank loan and a \$12 million LIHTC investment.

Refer to Table 1 Other Products in the Washington-Arlington-Alexandria MMA section of Appendix D for data on these LCs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Bethesda AA is not inconsistent with the bank's overall outstanding performance under the Lending Test in the Washington-Arlington-Alexandria AA. CONA's performance in the limited-scope area did not impact the overall Lending Test rating in the MMA. Refer to Tables 1 through 12 in the Washington-Arlington-Alexandria MMA section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the Washington-Arlington-Alexandria MMA is rated outstanding. Based on a full-scope review, the bank's performance in the Washington-Arlington-Alexandria AA is excellent.

Refer to Table 14 in the Washington-Arlington-Alexandria MMA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

CONA has an excellent level of qualified investments and grants and makes extensive use of innovative and/or complex investments to support CD initiatives. CONA originated 478 qualified investments and grants totaling \$248 million. Additionally, 51 prior period investments totaling \$208 million remain outstanding and provide continuing benefit to the AA.

The bank's responsiveness to the CD needs in the AA is excellent. A substantial majority of the dollar volume of the bank's current and prior period investment transactions is LIHTCs and focuses on affordable housing, a primary credit need in the AA. Grants were made to a variety of organizations that support affordable housing or community services targeted to LMI individuals, small business development, or revitalization and stabilization of LMI geographies.

One example of a complex, innovative and responsive investment is the \$13.4 million LIHTC investment to finance the rebuilding of a 63-unit apartment complex in Washington D.C. that was destroyed by fire in 2008. All units are set aside for LMI households. The bank's investment included a \$100 thousand Social Purpose grant to fund both on-and-off site social services for residents. This complex transaction involved additional sources of financing, including funds from the City and is very responsive to the need to preserve affordable housing in this high-cost market.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Bethesda AA is weaker than the bank's overall outstanding performance under the Investment Test in the Washington-Arlington-Alexandria AA and is considered good. The weaker performance is due to a lower level of investments relative to the bank's operations in the AA. CONA's performance in the limited-scope area did not impact the overall Investment Test

rating in the Washington-Arlington-Alexandria MMA. Refer to Table 14 in the Washington-Arlington-Alexandria MMA section of Appendix D for the facts and data that support this conclusion.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the Washington-Arlington-Alexandria MMA is rated high satisfactory. Based on a full-scope review, the bank's performance in the Washington-Arlington-Alexandria AA is good.

Retail Banking Services

Refer to Table 15 in the Washington-Arlington-Alexandria MMA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Retail delivery systems are accessible to geographies and individuals of different income levels, after considering branches in MUI geographies that are in close proximity to LMI geographies. There are 126 branches within the Washington-Arlington-Alexandria AA. Three branches are located in geographies with no income designation. The percentage of the bank's branches located in low-income geographies is below the percentage of the population residing in those geographies. The percentage of the bank's branches located in moderate-income geographies is near to the percentage of the population residing in those geographies. However, the bank has 20 branches in MUI geographies that border LMI geographies or are adjacent and within one-half mile or less in proximity to LMI geographies. After considering these branches, accessibility improves and is considered good. CONA's alternative delivery systems, including ATMs, online and mobile banking, and phone banking services, are effective and provide additional delivery system availability and access to retail banking services. The distribution of deposit-taking ATMs is not inconsistent with the branch distribution. The bank's branch distribution in 2011 was not inconsistent with the distribution in 2012/2013.

CONA's record of opening and closing branches generally has not adversely affected accessibility of its delivery systems in the AA, particularly in LMI geographies. During the evaluation period, the bank opened two branches. One branch opened in a low-income geography, and one branch opened in a moderate-income geography. The bank closed 12 branches in MUI geographies and three branches in moderate-income geographies. Five of the 12 closed branches in MUI geographies were less than 0.5 miles from a LMI geography. Four of these branches had another branch less than 3 miles from the closed branch, and one had two other branches within 11 miles from the closed branch. One of the closed moderate-income branches had another branch 1.6 miles away, and one had another branch 4.2 miles away with good public transportation to the shopping center where the branch was located. The third closed moderate-income branch was an isolated branch 33 miles from the closest branch.

Branch hours and services do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. Branch hours are generally 9:00 a.m. through 5:00 p.m. Monday through Thursday and 9:00 a.m. through 6:00 p.m. on Friday. Most branches, including branches in LMI geographies, are open Saturday.

Community Development Services

CONA is a leader in providing CD services that are responsive to the identified needs in the AA. Bank employees provided more than 13 thousand hours of service to 101 organizations in the AA that meet the definition of CD. This includes 27 employees who served in leadership roles as Board or committee members for 31 of the organizations. A majority of the services related to financial education to LMI students and to organizations that focus on community services targeted to LMI individuals and economic development. The following is an example of a highly responsive CD service:

- CONA partnered with a nonprofit economic development corporation to launch the Capital One Entrepreneur Lab in the Anacostia section of Washington DC. The lab provides up to 30 small businesses with affordable workstations, offices, meeting space, shared equipment and access to business training workshops conducted by CONA bankers and others. During the evaluation period, CONA presented 26 workshops attended by 429 entrepreneurs. This initiative promotes economic development and new job creation in a historically lower-income community

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Bethesda AA is excellent and stronger than the high satisfactory Service Test rating for the Washington-Arlington-Alexandria AA. The stronger performance is due to a stronger branch distribution. CONA's performance in the limited-scope area did not impact the overall Service Test rating in the Washington-Arlington-Alexandria MMA. Refer to Washington-Arlington-Alexandria MMA Table 15 in Appendix D for the facts and data that support these conclusions.

State of Louisiana

CRA Rating for Louisiana:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Excellent lending activity, considering the strong competition in the market for all types of loans and the bank's business strategy;
- Excellent geographic distribution of loans;
- A significantly positive level of CD loans was originated;
- CONA's use of flexible lending products had a positive impact on the lending test;
- Excellent level of CD investments that were responsive to AA needs;
- Retail delivery systems are accessible to geographies and individuals of different income levels, after considering branches in MUI geographies that are in close proximity to LMI geographies; and
- CONA is a leader in providing CD services that are responsive to the needs of the bank's AA.

Description of Institution's Operations and Scope of Evaluation in Louisiana

Within the state of Louisiana, CONA operates 179 branches within nine AAs. Based on the June 30, 2013 FDIC Summary of Deposit Market Share report, CONA's deposits in the state of Louisiana totaled \$19.1 billion (excluding allocated Internet deposits), which represents 10.2 percent of the bank's total domestic deposits. In terms of deposit market share, CONA ranks first with a 23.3 percent share compared to second and third ranked JP Morgan Chase and Whitney Bank with 19.5 percent and 10.5 percent, respectively. CONA competes with 119 depository institutions within the state.

In evaluating the state of Louisiana, we conducted a full-scope review of the New Orleans AA, as this AA accounted for 54 percent of the bank's deposits, 39 percent of the loans, and 30 percent of the branches in the state of Louisiana. Limited-scope reviews were conducted for the Alexandria, Baton Rouge, Houma, Lafayette, Lake Charles, Monroe, Shreveport, and the Louisiana non-MSA AAs.

Although Hurricanes Katrina and Rita occurred more than eight years ago, New Orleans continues to rebuild from the massive destruction caused by these natural disasters. The area

continues to be a designated recovery zone. Although the unemployment rate in the New Orleans AA is now lower, this is because the workforce is still 15 percent below pre-Katrina levels. Many individuals left the area due to the loss of homes and/or jobs just after Katrina and nearly 100 thousand did not return. According to the U.S. Census data, the number of owner-occupied units declined by 34,417 between 2000 and 2010, including a decline of 3,177 units in LMI geographies. The reduction in units led to higher home prices, which has also been exacerbated by an increase in homeowner insurance rates. Other economic and demographic factors considered in our evaluation, such as the high poverty rate in the AA, are discussed in the market profile in Appendix C.

Refer to the market profile for the state of Louisiana in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Louisiana is rated outstanding. Based on a full-scope review, the bank's performance in the New Orleans AA is excellent.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the state of Louisiana section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the AA is excellent, considering the strong competition in the market for all types of loans and the bank's business strategy. Of the bank's reported loans, 82 percent were small loans to businesses and 18 percent were mortgage loans. CONA's market shares clearly reflect its lending strategy.

Based on the June 30, 2013 FDIC Summary of Deposit Market Share report, the bank ranks first in deposits with a 33.3 percent deposit market share. For small loans to businesses, the bank ranks first with a 27.4 percent market share. There were 69 lenders and 36 depository institutions in the AA.

In overall home mortgage lending, CONA ranked ninth with a 2.7 percent market share. For home purchase lending, the bank ranked 17th with a 1.2 percent market share. For home improvement lending, the bank ranked second with a 14.4 percent market share, and for home refinancing, the bank ranked eighth with a 2.9 percent market share. Mortgage lending in the AA is very competitive with 378 lenders, most without a deposit presence.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is excellent. This is based on excellent distribution of both home mortgage loans and small loans to businesses.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The overall geographic distribution of home mortgage lending in the New Orleans AA is excellent. The geographic distribution of all home mortgage products for 2012/2013 is excellent. The distribution for all loan products was nearly identical. For all home mortgage loan products, the bank's percentage of loans in both LMI geographies exceeded the percentage of owner-occupied units in those geographies. The bank's market share in both LMI geographies exceeded the bank's overall market share for home purchase and home refinance loans. For home improvement loans, the bank's market share in low-income geographies was below and in moderate-income geographies exceeded the bank's overall market share. Performance for 2011 for home purchase was not inconsistent with the distribution for 2012/2013. In 2011, the distribution of home improvement loans was weaker than the distribution for 2012/2013 and considered good. In 2011, the distribution of home refinance loans was weaker than the distribution in 2012/2013 and considered adequate.

Small Loans to Businesses

Refer to Table 6 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses in the New Orleans AA is excellent. During 2012/2013, the portion of small loans to businesses in LMI geographies exceeded the percentage of businesses within these geographies. The bank's market share in both LMI geographies exceeded its overall market share. Performance in 2011 was not inconsistent with the distribution in 2012/2013.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of the borrower is good. This is based on good distribution of home mortgage loans and good distribution of small loans to businesses.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income in the New Orleans AA is good.

The distribution of home purchase loans by borrower income is excellent. The percentage of loans made to low-income borrowers was near to the percentage of such families. The percentage of loans made to moderate-income borrowers exceeded the percentage of such

families. The bank's market share to low-income families exceeded and to moderate-income families was below the bank's overall market share.

The distribution of home improvement loans by borrower income is excellent. The percentage of loans made to low-income borrowers approximated the percentage of such families. The percentage of loans made to moderate-income borrowers exceeded the percentage of such families. The bank's market share to both LMI families exceeded the bank's overall market share.

The distribution of home refinance loans by borrower income is good. The percentage of loans made to low-income borrowers was below the percentage of such families. The percentage of loans made to moderate-income borrowers exceeded the percentage of such families. The bank's market share to LMI families exceeded the bank's overall market share.

Performance for all three products in 2011 was not inconsistent with the performance in 2012/2013.

Small Loans to Businesses

The overall distribution of loans to businesses of different sizes in the New Orleans AA is good. For 2012/2013, the data in Table 11 in the state of Louisiana section of Appendix D shows the percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) was below the percentage of small business. However, revenue was not reported for approximately 47 percent of the small loans to businesses. Many of these were HSBC loans acquired by CONA and for which revenue data was not provided or credit cards for which business revenue is not considered in the underwriting. When considering only the 53 percent of loans with revenue reported, the percentage of small loans to small businesses (86 percent) exceeded the percentage of small businesses (59 percent). Because neither of these analyses provides a true representation of the bank's lending performance, we selected a statistically valid random sample of 60 loans without revenue reported in this AA and performed a borrower distribution based on the results of the sample. For this AA, 30 of the 60 loans (50 percent) in the sample were to businesses with gross annual revenues of \$1 million or less. This percentage (50 percent) was near to the percentage of small businesses (59 percent) and considered good. The bank's market share to small businesses is below the bank's overall market share. Performance in 2011 is stronger than in 2012/2013 and considered excellent. The stronger performance is due to the bank's excellent distribution of loans to businesses of different sizes and the bank's excellent market share.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Louisiana section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

A significantly positive level of CD loans was originated. The bank originated 53 loans totaling \$241.3 million that were responsive to AA credit needs. This volume represents 21.3 percent

of allocated Tier One Capital. The loans were responsive to the identified needs of the AA, including affordable housing, economic development, and revitalization/stabilization of the area as the region continues to recover from Hurricanes Katrina and Rita.

An example of CONA's CD lending is the \$71.2 million in loans for the redevelopment of a former landmark bank building that includes 175 units of housing, including 91 for LMI households, and commercial space. This complex transaction involved multiple sources of financing, including NMTCs from other entities, state and federal historic tax credits, and a HUD Community Development Block Grant.

Product Innovation and Flexibility

The bank's use of flexible loan products had a positive impact on the Lending Test. During the evaluation period, the bank originated 45 DREAM and 153 SUHILs totaling over \$3 million, and 103 FHA loans totaling \$15.3 million. CONA also originated 30 SBA loans totaling \$1.6 million and referred 194 small businesses to CDFIs during the evaluation period. Additionally, the bank provided three loans totaling \$1.8 million to accommodate nonprofit housing developers that do not meet traditional bank criteria. These loans helped finance the construction of 13 single-family homes for LMI persons.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in all of the AAs, with the exception of the Lafayette AA, is not inconsistent with the bank's overall outstanding performance under the Lending Test in the New Orleans AA. In the Lafayette AA, the bank's performance is weaker than its overall outstanding performance under the Lending Test in the New Orleans AA and is considered good. The weaker performance is due to a lower level of CD lending in the AA. CONA's performance in the limited-scope areas did not impact the overall Lending Test rating in the MMA. Refer to Tables 1 through 12 in the state of Louisiana section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the state of Louisiana is rated outstanding. Based on a full-scope review, the bank's performance in the New Orleans AA is excellent.

Refer to Table 14 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

CONA has an excellent level of qualified investments and grants and makes extensive use of innovative and/or complex investments to support CD initiatives. CONA originated 261 qualified investments and grants totaling \$62 million. Additionally, 23 prior period investments totaling \$118.8 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period investment dollar volume represents 16.0 percent of the bank's allocated Tier One Capital.

The bank's responsiveness to the CD needs in the AA is excellent. A substantial majority of the dollar volume of the bank's investment transactions is LIHTCs and focuses on affordable housing, a primary credit need in the AA. Grants were made to a variety of organizations that support affordable housing or community services targeted to LMI individuals, small business development, or revitalization and stabilization of LMI geographies.

The following two examples demonstrate CONA's leadership, excellent responsiveness to the CD needs in the area, and the complexity of some of the developments in the AA:

- CONA provided a \$10.9 million LIHTC and Historic Tax Credits to convert a historic, blighted hotel property into 32 units of affordable rental housing for LMI households. Four of the units are reserved for households earning only up to 30 percent of AMI. The property, located in the Theatre District, will help to revitalize the neighborhood. CONA demonstrated leadership and commitment to the community by driving the timely closing of the transaction, thereby preventing another purchaser from acquiring the property and redeveloping it into something other than affordable housing.
- CONA provided a \$4.5 million LIHTC and Historic Tax Credits to finance the conversion of a historic, blighted industrial building into a mixed-income residential property in a low-income geography in New Orleans. The property includes 21 units for LMI households and 10 market-rate units. This complex transaction included additional sources of financing, including CONA's \$4 million in loans and Community Development Block Grant funds from the State. CONA's investment will not only provide affordable housing for LMI households, but will also restore a historically valuable building and help revitalize the neighborhood.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in all of the AAs, with the exception Houma, is not inconsistent with the bank's overall outstanding performance under the Investment Test in the New Orleans AA. In the Houma AA, the bank's performance is weaker than its overall outstanding performance under the Investment Test in the New Orleans AA and considered very poor. The weaker performance is due to a lower level of investments relative to the bank's operations in the AA. CONA's performance in the limited-scope area did not impact the overall Investment Test rating in Louisiana. Refer to Table 14 in the state of Louisiana section of Appendix D for the facts and data that support this conclusion.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Louisiana is rated high satisfactory. Based on a full-scope review, the bank's performance in the New Orleans AA is good.

Retail Banking Services

Refer to Table 15 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Retail delivery systems are accessible to geographies and individuals of different income levels, after considering branches in MUI geographies that are in close proximity to LMI geographies. There are 53 branches in the New Orleans AA. The percentage of the bank's branches located in low-income geographies is well below the percentage of the population residing in those geographies. The percentage of the bank's branches located in moderate-income geographies approximates the percentage of the population residing in those geographies. However, the bank has 14 branches in MUI geographies that border LMI geographies or are adjacent and within one-half mile or less in proximity to LMI geographies. After considering these branches, accessibility improves and is considered good. CONA's alternative delivery systems, including ATMs, online and mobile banking, and phone banking services, are effective and provide additional delivery system availability and access to retail banking services. The distribution of deposit-taking ATMs is not inconsistent with the branch distribution. The bank's branch distribution in 2011 was not inconsistent with the distribution in 2012/2013.

CONA's record of opening and closing branches generally has not affected the accessibility of its delivery systems in the AA, particularly in LMI geographies. CONA opened one branch in a low-income geography and one branch in a moderate-income geography. It closed five branches, including three in MUI geographies and two branches in moderate-income geographies.

Branch hours and services do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. Branch hours are generally 9:00 a.m. to 4:00 p.m. Monday through Thursday and 9:00 a.m. to 5:00 p.m. on Friday. Approximately half of the branches are closed Saturday due to decreased weekend business in those locations. There is no apparent indication that Saturday closings had a disproportionately negative impact on LMI geographies.

Community Development Services

CONA is a leader in providing CD services that are responsive to the identified needs in the AA. Bank employees provided more than six thousand hours of service to 61 organizations in the AA that meet the definition of CD. This includes 21 employees who served in leadership roles as Board or committee members for 29 of the organizations. A majority of the services related to financial education and included workshops and seminars targeted to LMI children, teens, adults and seniors as well as small business owners. Services were also provided to organizations that focus on community services targeted to LMI individuals, economic development, and revitalization. The following is an example of a highly responsive CD service:

- A CONA employee serves on the Board of an organization whose mission is to increase the number of LMI homeowners while transforming vacant or substandard properties

into sustainable residences. This includes providing financial counseling and arranging financing for potential purchase of the organization's properties. The bank employee also serves on the Loan Committee.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Alexandria, Baton Rouge, Houma, Lafayette, Monroe, and the Louisiana Non-MSA AAs is not inconsistent with the bank's overall high satisfactory performance under the Service Test in the New Orleans AA. In the Lake Charles and Shreveport AAs, the bank's performance is stronger than the bank's overall high satisfactory performance under the Service Test in the New Orleans AA and is considered excellent. Performance differences in the limited-scope areas are due to stronger branch distributions. CONA's performance in the limited-scope areas did not impact the overall Service Test rating in Louisiana. Refer to Table 15 in the state of Louisiana section of Appendix D for the facts and data that support these conclusions.

Other Rating Areas

State of Connecticut

CRA Rating for Connecticut:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating:

- Excellent lending activity, considering the bank’s limited presence in the state, strong competition, and its small business lending focus;
- Excellent geographic distribution of loans;
- A significantly positive level of CD loans was originated;
- Excellent level of CD investments that were responsive to AA needs;
- Retail delivery systems are reasonably accessible to geographies and individuals of different income levels; and
- An adequate level of CD services that are responsive to the needs of the bank’s AA.

Description of Institution’s Operations and Scope of Evaluation in Connecticut

CONA has a very limited presence in Connecticut. The bank operates one branch within the New Haven AA. With \$213.5 million in deposits (excluding allocated Internet deposits), the bank ranks 14th among 28 insured depository institutions in the AA with a deposit market share of nearly one percent. Performance in the state had a minimal impact on the bank’s overall CRA rating. We conducted a full-scope review of the New Haven AA.

Refer to Tables 1-15 in the Connecticut section of Appendix D for the facts and data that support all Test conclusions.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Lending Test in Connecticut is rated outstanding. Based on a full-scope review, the bank’s performance in the New Haven AA is excellent.

Lending Activity - Lending activity in the AA is excellent, considering the bank's limited presence, strong competition within the AA for all types of loans and the bank's focus on small business lending. The bank's primary lending product in this AA is small loans to businesses. The bank ranks 14th of 28 institutions in deposits with a 0.96 percent deposit market share. For small loans to businesses, the bank ranks second among 78 lenders with a 14.2 percent market share. The lender ahead of CONA is a nationwide credit card lender with a market share of 30.4 percent. In overall HMDA lending, the bank ranks 101st among 385 lenders. For all home mortgage products, the bank has minimal market shares and low rankings, making an analysis not meaningful.

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is excellent. The distribution of loans to geographies of different income levels for 2012/2013 is excellent. The distribution of small loans to businesses and home refinance loans is excellent. The volume of home purchase and improvement loan did not provide for a meaningful analysis. Mortgage loan volume in 2011 was insufficient for a meaningful analysis. Performance in 2011 for small loans to businesses was not inconsistent with 2012/2013.

Distribution of Loans by Income Level of the Borrower – The distribution of loans by income level of the borrower for the entire evaluation period is good. For 2012/2013, the distribution of home refinance loans is excellent, and the distribution of loans to businesses of different sizes is good. For 2012/2013, the data in Table 11 in the state of Connecticut section of Appendix D shows the percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) was well below the percentage of small business. However, revenue was not reported for approximately 77 percent of the small loans to businesses. Many of these were HSBC loans acquired by CONA and for which revenue data was not provided or credit cards for which business revenue is not considered in the underwriting. When considering only the 23 percent of loans with revenue reported, the percentage of small loans to small businesses (85 percent) exceeded the percentage of small businesses (73 percent). Because neither of these analyses provides a true representation of the bank's lending performance, we selected a statistically valid random sample of 60 loans without revenue reported in this AA and performed a borrower distribution based on the results of the sample. For this AA, 37 of the 60 loans (62 percent) in the sample were to businesses with gross annual revenues of \$1 million or less. This percentage (62 percent) was near to the percentage of small businesses (73 percent) and considered good. The bank's market share to small businesses is below the bank's overall market share. Mortgage loan volume in 2011 was insufficient for a meaningful analysis. Performance in 2011 for small loans to small businesses was weaker than in 2012/2013 and considered adequate. The weaker performance is due to the bank's adequate distribution of loans to businesses of different sizes and the bank's excellent market share.

Community Development Lending – CONA originated a significantly positive level of CD loans. The bank originated two loans for \$20.3 million, which represented 31 percent of allocated Tier One Capital. Both loans addressed the need of affordable housing for LMI individuals.

Product Innovation and Flexibility – CONA's use of flexible loan programs had a neutral impact on its Lending Test performance in this AA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Connecticut is rated outstanding. Based on a full-scope review, the bank's performance in the New Haven AA is excellent.

CONA has an excellent level of qualified investments and grants and exhibits excellent responsiveness to the CD needs in the AA. During the current evaluation period, CONA made nine investments in the AA totaling \$4.7 million. Additionally, six prior period investments totaling \$8.1 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period investment dollar volume represents 19.7 percent of the bank's allocated Tier One Capital. A substantial majority of the dollar volume of the bank's investments related to affordable senior housing, a primary credit need in the AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Connecticut is rated low satisfactory. Based on a full-scope review, the bank's performance in the New Haven AA is adequate.

Retail Banking Services - Retail delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank has one branch in this market, which is located in a middle-income geography. CONA's alternative delivery systems, including ATMs, online and mobile banking, and phone banking services, are effective and provide additional delivery system availability and access to retail banking services. There were no branch openings or closings during the evaluation period.

Community Development Services - The bank provides an adequate level of CD services, considering its very limited presence in this market. Three employees provided financial education for LMI audiences served by three different organizations whose mission meets the definition of CD.

State of Delaware

CRA Rating for Delaware:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Excellent lending activity, considering the bank's limited presence in the state, strong competition, and its small business lending focus;
- Excellent geographic distribution of loans;
- A significantly positive level of CD loans was originated;
- Excellent level of CD investments that were responsive to AA needs;
- Retail delivery systems are reasonably accessible to geographies and individuals of different income levels; and
- A good level of CD services that are responsive to the needs of the bank's AA.

Description of Institution's Operations and Scope of Evaluation in Delaware

CONA has a very limited presence in Delaware. The bank operates one branch within the Sussex County non-MSA AA. With \$59.0 million in deposits (excluding allocated Internet deposits), the bank ranks 11th among 16 insured depository institutions in the Sussex County non-MSA AA with a deposit market share of 0.13 percent. Based on the June 30, 2013 FDIC Summary of Deposit Market Share report, CONA housed an additional \$87 billion of Internet deposits at a service center in Wilmington. The \$87 billion in Internet deposits represents approximately 47 percent of the bank's total domestic deposits. For analysis purposes, because there is no branch in Wilmington, the Internet deposits that were located in CONA's footprint were allocated to a specific AA, based on where the customer lives. The Internet deposits that were located outside of CONA's designated AAs were assigned to CONA's headquarters, which is located in the Washington-Arlington-Alexandria AA. We conducted a full-scope review of the Sussex County non-MSA AA. Performance in the state had a minimal impact on the bank's overall CRA rating.

Refer to Tables 1-15 in the Delaware section of Appendix D for the facts and data that support all Test conclusions.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Delaware is rated outstanding. Based on a full-scope review, the bank's performance in the Sussex County non-MSA AA is excellent.

Lending Activity - Lending activity in the AA is excellent, considering the bank's limited presence, strong competition within the AA for all types of loans and the bank's focus on small business lending. The bank's primary lending product in this AA is small loans to businesses. The bank ranks 11th of 16 institutions in deposits with a 0.13 percent deposit market share. For small loans to businesses, the bank ranks second among 44 lenders with a 16 percent market share. The lender ahead of CONA is a nationwide credit card lender with a market share of 19.5 percent. In overall HMDA lending, the bank ranks 36th among 342 lenders with a 0.40 percent market share. For all home mortgage products, the bank has minimal market shares, making an analysis not meaningful.

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is excellent. The distribution of loans to geographies of different income levels for 2012/2013 is excellent. The distribution of small loans to businesses and home refinance loans is excellent. The volume of home purchase and improvement loans did not provide for a meaningful analysis. For 2011, a geographic analysis is not meaningful, as there were no LMI geographies based on Census 2000.

Distribution of Loans by Income Level of the Borrower - The distribution of loans by income level of the borrower for the evaluation period is good. For 2012/2013, the distribution of home refinance loans is excellent, and the distribution of loans to businesses of different sizes is good. For 2012/2013, the data in Table 11 in the state of Delaware section of Appendix D shows the percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) was well below the percentage of small business. However, revenue was not reported for approximately 70 percent of the small loans to businesses. Many of these were HSBC loans acquired by CONA and for which revenue data was not provided or credit cards for which business revenue is not considered in the underwriting. When considering only the 30 percent of loans with revenue reported, the percentage of small loans to small businesses (87 percent) exceeded the percentage of small businesses (73 percent). Because neither of these analyses provides a true representation of the bank's lending performance, we selected a statistically valid random sample of 60 loans without revenue reported in this AA and performed a borrower distribution based on the results of the sample. For this AA, 41 of the 60 loans (68 percent) in the sample were to businesses with gross annual revenues of \$1 million or less. This percentage (68 percent) was near to the percentage of small businesses (73 percent) and considered good. The bank's market share to small businesses is below the bank's overall market share. The volume of home purchase and home improvement loans for 2012/2013 did not provide for a meaningful analysis. For 2011, the distribution of loans to businesses of different sizes is not inconsistent with 2012/2013. The mortgage loan volume for all products in 2011 was insufficient for a meaningful analysis.

Community Development Lending – The bank originated a significantly positive level of CD loans. CONA refinanced an \$8.5 million loan to a skilled nursing and rehabilitation facility that primarily serves LMI persons. This loan represented 47.8 percent of allocated Tier One Capital.

Product Innovation and Flexibility – CONA’s use of flexible loan programs had a neutral impact on its Lending Test performance in this AA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Investment Test in Delaware is rated outstanding. Based on a full-scope review, the bank’s performance in the Sussex County non-MSA is excellent.

CONA has an excellent level of qualified investments and grants and exhibits excellent responsiveness to the CD needs of the AA. During the current evaluation period, CONA made nine investments in the AA totaling \$3.9 million. Additionally, two prior period investments totaling \$555 thousand remain outstanding and provide continuing benefit to the AA. The combined current and prior period investment dollar volume represents 25.1 percent of the bank’s allocated Tier One Capital. A substantial majority of the dollar volume of the bank’s investment transactions is focused on affordable housing for LMI individuals, a primary credit need in the AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Service Test in Delaware is rated low satisfactory. Based on a full-scope review, the bank’s performance in the Sussex County non-MSA AA is adequate.

Retail Banking Services - Retail delivery systems are reasonably accessible to geographies and individuals of different income levels. There are no low-income geographies in the AA and only seven moderate-income geographies. The bank has a limited presence in the AA with one branch in this market, which is located in a middle-income geography. CONA’s alternative delivery systems, including ATMs, online and mobile banking, and phone banking services, are effective and provide additional delivery system availability and access to retail banking services. There were no branch openings or closings during the evaluation period.

Community Development Services - The bank provides a good level of CD services, considering its very limited presence and staffing in this market. One employee serves on the Board of an organization whose primary mission is affordable housing for LMI individuals, an identified need in this market. Additionally, five associates provided financial education sessions.

State of Maryland

CRA Rating for Maryland:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Excellent lending activity, considering the strong competition within the AA for all types of loans and the bank's focus on small business lending;
- Excellent geographic distribution of loans;
- A significantly positive level of CD loans was originated;
- CONA's use of flexible products had a positive impact on the Lending Test;
- Excellent level of CD investments that were responsive to AA needs;
- Retail delivery systems are reasonably accessible to geographies and individuals of different income levels;
- Branch openings improved accessibility; and
- A good level of CD services that are responsive to the needs of the bank's AA.

Description of Institution's Operations and Scope of Evaluation in Maryland

Outside of the Maryland portion of the Washington-Arlington-Alexandria MMA, CONA has defined three AAs: Baltimore AA (Baltimore-Towson MSA, excluding Harford County), Hagerstown AA (entire MSA), and the Maryland non-MSA AA, which consists of St. Mary's and Talbot counties. The bank operates 30 branches in the AAs.

Based on the June 30, 2013 FDIC Summary of Deposit Market Share report, CONA's deposits in the state of Maryland totaled \$1.1 billion (excluding allocated Internet deposits), representing less than one percent of the bank's domestic deposits. In terms of deposit market share, the bank ranks ninth out of 81 depository institutions with a market share of 1.7 percent. Major competitors (and their associated market shares) are Bank of America (24.6 percent), M&T Bank (21.9 percent) and PNC Bank (10.8 percent).

In evaluating the state of Maryland, we conducted a full-scope review of the Baltimore AA, as this AA accounted for 91 percent of the bank's deposits when excluding allocated Internet deposits, 93 percent of the bank's deposits when including allocated Internet deposits, 89 percent of the loans, and 87 percent of the branches in the state of Maryland. We conducted

limited-scope reviews of the Hagerstown and Maryland non-MSA AAs. The bank's performance in this state had a minimal impact on its overall CRA rating.

Refer to Tables 1-15 in the Maryland section of Appendix D for the facts and data that support all Test conclusions.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Maryland is rated outstanding. Based on a full-scope review, the bank's performance in the Baltimore AA is excellent.

Lending Activity - Lending activity in the AA is excellent, considering the strong competition within the AA for all types of loans and the bank's focus on small business lending. The bank's primary lending product in this AA is small loans to businesses. Small loans to businesses represented 90 percent of total loans in this AA. The bank ranks ninth among 70 depository institutions with a 1.6 percent deposit market share. For small loans to businesses, the bank ranks second among 105 lenders with a 14.1 percent market share. The lender ahead of CONA is a nationwide credit card lender with a market share of 29.5 percent. In overall HMDA lending, the bank ranks 45th among 581 lenders with a market share of 0.37 percent. For all home mortgage products, the bank has minimal market shares, making an analysis not meaningful.

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is excellent. The distribution of loans to geographies of different income levels for 2012/2013 is excellent. The distribution of all home mortgage products and small loans to businesses is excellent. For 2011, only home refinance and small loans to businesses were analyzed. The volume of home purchase and improvement loans did not provide for a meaningful analysis. The distribution of home refinance loans is adequate and the distribution of small loans to businesses is excellent.

Distribution of Loans by Income Level of the Borrower – The distribution of loans by income level of the borrower for the evaluation period is adequate. For 2012/2013, the distribution of all home mortgage products is excellent, and the distribution of loans to businesses of different sizes is adequate. For 2012/2013, the data in Table 11 in the state of Maryland section of Appendix D shows the percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) was well below the percentage of small business. However, revenue was not reported for approximately 65 percent of the small loans to businesses. Many of these were HSBC loans acquired by CONA and for which revenue data was not provided or credit cards for which business revenue is not considered in the underwriting. When considering only the 35 percent of loans with revenue reported, the percentage of small loans to small businesses (87percent) exceeded the percentage of small businesses (72 percent). Because neither of these analyses provides a true representation of the bank's lending performance, we selected a statistically valid random sample of 60 loans without revenue reported in this AA and performed a borrower distribution based on the results of the sample. For this AA, 32 of the 60 loans (53 percent) in the sample were to businesses with gross annual revenues of \$1 million or less. This percentage (53 percent) was below the

percentage of small businesses (72 percent) and considered adequate. The bank's market share to small businesses is below the bank's overall market share. For 2011, only home refinance and small loans to businesses were analyzed. The distribution of home refinance loans is weaker than in 2012/2013 and considered good. The weaker performance is due to a weaker distribution of home refinance loans. The distribution of small loans to businesses is stronger than in 2012/2013 and considered good. The stronger performance is due to the bank's good distribution of loans to businesses of different sizes and excellent market share.

Community Development Lending – The bank originated a significantly positive level of CD loans. CONA made 14 loans totaling \$94.1 million, which represented 37.7 percent of allocated Tier One Capital. A substantial majority of the dollars targeted affordable housing for LMI persons and was responsive to AA credit needs.

Product Innovation and Flexibility – CONA's use of flexible products had a positive impact on the Lending Test. During the evaluation period, the bank originated 204 SUHILs, 31 FHA loans totaling \$8.3 million, seven VA loans totaling \$2.0 million, and one SBA loan for \$20 thousand.

Other Loan Data – The bank issued a \$3.5 million LC to support the construction of a 64 unit affordable housing development for LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Hagerstown AA and Maryland non-MSA is not inconsistent with the bank's overall outstanding performance under the Lending Test in the Baltimore AA. CONA's performance in the limited-scope areas did not impact the overall Lending Test rating in Maryland.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Maryland is rated outstanding. Based on a full-scope review, the bank's performance in the Baltimore AA is excellent.

CONA has an excellent level of qualified investments and grants, exhibits excellent responsiveness to the CD needs of the AA and makes extensive use of complex investments to support CD initiatives. During the current evaluation period, CONA made 52 investments in the AA totaling \$89.6 million. Additionally, six prior period investments totaling \$27.7 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period investment dollar volume represents 47.1 percent of the bank's allocated Tier One Capital. A substantial majority of the dollar volume of the bank's investments targeted affordable housing for LMI individuals and was responsive to the CD needs in the AA. The bank's current and prior period investment transactions were LIHTCs. These transactions are considered complex and provide new or rehabilitated affordable housing units.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Maryland non-MSA AA is not inconsistent with the bank's overall outstanding performance under the Investment Test in the Baltimore AA. In the Hagerstown AA, CONA's performance is weaker than the bank's overall outstanding performance under the Investment Test in the Baltimore AA and is considered poor. The weaker performance is due to a lower amount of investments relative to the bank's operations in the AA. CONA's performance in the limited-scope areas did not impact the overall Investment Test rating in Maryland.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Maryland is rated high satisfactory. Based on a full-scope review, the bank's performance in the Baltimore AA is good.

Retail Banking Services - Retail delivery systems are reasonably accessible to geographies and individuals of different income levels. There are 26 branches in the Baltimore AA. During the evaluation period, the 2010 Census resulted in two LMI branches being reclassified. One branch was reclassified from a low-income geography to a geography in which the income level is unknown, and one branch was reclassified from a moderate-income geography to a middle-income geography. The percentage of branches located low-income geographies is well below, and the percentage of branches located in moderate-income geographies is near to the percentage of population residing in those respective areas. CONA's alternative delivery systems, including ATMs, online and mobile banking, and phone banking services, are effective and provide additional delivery system availability and access to retail banking services. CONA opened four branches, all of which are in LMI geographies. CONA closed one branch in a low-income geography and one branch in a geography with no income designation. Branch hours and services do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals.

Community Development Services - The bank provides a good level of CD services that are responsive to the financial education needs in this market. Bank associates provided more than one thousand hours of service to seven different organizations during the evaluation period. One bank associate held a leadership position on the Board of a CD organization.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Hagerstown AA and in the Maryland non-MSA AA is weaker than the bank's overall high satisfactory performance under the Service Test in the Baltimore AA and considered adequate. Performance differences in the limited-scope areas are due to weaker branch distributions. CONA's performance in the limited-scope areas did not impact the overall Service Test rating in Maryland.

State of New Jersey

CRA Rating for New Jersey:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating:

- Excellent lending activity, considering the bank's limited presence, strong competition within the AA for all types of loans and the bank's focus on small business lending;
- Excellent geographic distribution of loans;
- A positive level of CD loans was originated;
- CONA's use of flexible lending products had a positive impact on the Lending Test;
- Excellent level of CD investments that were responsive to AA needs;
- Retail delivery systems are reasonably accessible to geographies and individuals of different income levels; and
- An adequate level of CD services that are responsive to the needs of the bank's AA.

Description of Institution's Operations and Scope of Evaluation in New Jersey

Outside of the New York-Northern New Jersey-Long Island MMA, CONA has a very limited presence in New Jersey. The bank operates one branch in the Trenton AA, which consists of Mercer County in its entirety. The bank has nearly \$61 million in deposits (excluding allocated Internet deposits) and ranks 23rd out of 27 depository institutions with a 0.41 percent deposit market share. Major competitors (and their deposit market share) in the AA include Bank of America (23.9 percent), PNC Bank (13.1 percent) and Wells Fargo (12.3 percent). We conducted a full-scope review of the Trenton AA. The bank's performance in this state had a minimal impact on its overall CRA rating.

Refer to Tables 1-15 in the New Jersey section of Appendix D for the facts and data that support all Test conclusions.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in New Jersey is rated outstanding. Based on a full-scope review, the bank's performance in the Trenton AA is excellent.

Lending Activity - Lending activity in the AA is excellent, considering the bank's limited presence, strong competition within the AA for all types of loans and the bank's focus on small business lending. The bank's primary lending product in this AA is small loans to businesses. Small loans to businesses represented 94 percent of total loans in this AA. The bank ranks 23rd among 27 institutions in deposits with a 0.41 percent deposit market share. For small loans to businesses, the bank ranks second among 74 lenders with a 10.6 percent market share. The lender ahead of CONA is a nationwide credit card lender with a market share of 33 percent. In overall HMDA lending, the bank ranks 61st among 375 lenders with a market share of 0.22 percent. For all home mortgage products, the bank has minimal market shares and low rankings making an analysis not meaningful.

Distribution of Loans by Income Level of the Geography – The distribution of loans to geographies of different income levels for the entire evaluation period is excellent. The geographic distribution of small loans to businesses is excellent. The volume of all home mortgage products in both 2011 and 2012/2013 did not provide for a meaningful analysis.

Distribution of Loans by Income Level of the Borrower – The distribution of loans by income level of the borrower for the evaluation period is good. For 2012/2013, the distribution of loans to businesses of different sizes is good. For 2012/2013, the data in Table 11 in the state of New Jersey section of Appendix D shows the percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) was well below the percentage of small business. However, revenue was not reported for approximately 72 percent of the small loans to businesses. Many of these were HSBC loans acquired by CONA and for which revenue data was not provided or credit cards for which business revenue is not considered in the underwriting. When considering only the 28 percent of loans with revenue reported, the percentage of small loans to small businesses (92 percent) exceeded the percentage of small businesses (71 percent). Because neither of these analyses provides a true representation of the bank's lending performance, we selected a statistically valid random sample of 60 loans without revenue reported in this AA and performed a borrower distribution based on the results of the sample. For this AA, 36 of the 60 loans (60 percent) in the sample were to businesses with gross annual revenues of \$1 million or less. This percentage (60 percent) was near to the percentage of small businesses (71 percent) and considered good. The bank's market share to small businesses is below the bank's overall market share. For 2011, the distribution of small loans to businesses is not inconsistent with 2012/2013. The volume of all home mortgage products in both 2011 and 2012/2013 did not provide for a meaningful analysis.

Community Development Lending – The bank originated a positive level of CD loans. CONA originated one construction loan for \$3.75 million, which represented 7.8 percent of allocated Tier One Capital. The loan rehabilitated a 40-unit rental building in Trenton and was responsive to the critical need of affordable housing for LMI individuals, including those with special needs.

Product Innovation and Flexibility - CONA's use of flexible loan programs had a positive impact on its Lending Test performance. During the evaluation period, the bank originated nine loans totaling more than \$536 thousand under the CHB and SUHIL programs, and four FHA loans totaling \$788 thousand.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in New Jersey is rated outstanding. Based on a full-scope review, the bank's performance in the Trenton AA is excellent.

CONA has an excellent level of qualified investments and grants and exhibits excellent responsiveness to the CD needs in the AA. During the current evaluation period, CONA made 19 investments in the AA totaling \$8.5 million. Additionally, one prior period investment totaling \$1 million remains outstanding and provides continuing benefit to the AA. The combined current and prior period investment dollar volume represents 19.8 percent of the bank's allocated Tier One Capital. A substantial majority of the dollar volume of the bank's investments targeted affordable housing for LMI individuals, a primary need in the AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in New Jersey is rated low satisfactory. Based on a full-scope review, the bank's performance in the Trenton AA is adequate.

Retail Banking Services - Retail delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank has one branch and one ATM; both are located in an upper-income geography in this AA. CONA's alternative delivery systems, including ATMs, online and mobile banking, and phone banking services, are effective and provide additional delivery system availability and access to retail banking services. There were no branch openings or closings during the evaluation period.

Community Development Services - The bank provides an adequate level of CD services, considering its very limited presence in this market. Seven employees provided 37 hours of financial education related services.

State of Texas

CRA Rating for Texas:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Excellent lending activity, considering the strong competition and the bank's small business lending focus;
- Excellent geographic distribution of loans;
- The bank originated a significantly positive level of CD loans;
- CONA's use of flexible products had a positive impact on the Lending Test;
- Excellent level of CD investments that were responsive to AA needs;
- Retail delivery systems are accessible to geographies and individuals of different income levels; and
- An excellent level of CD services that are responsive to the needs of the bank's AA.

Description of Institution's Operations and Scope of Evaluation in Texas

CONA has 14 AAs and operates 172 branches in the state of Texas. Based on the June 30, 2013 FDIC Summary of Deposit Market Share report, the bank had \$10.4 billion in deposits (excluding allocated Internet deposits), representing 5.5 percent of the bank's total domestic deposits. In terms of deposit market share, CONA had a 1.9 percent share and ranked eight out of 327 depository institutions. JP-Morgan Chase (22.8 percent) and Bank of America (14.4 percent) ranked first and second, respectively.

In evaluating the state of Texas, we conducted a full-scope review of the Houston AA, as this AA accounted for 38 percent of the bank's deposits when excluding allocated Internet deposits, 39 percent of the bank's deposits when including allocated Internet deposits, 35 percent of the loans, and 30 percent of the branches in the state of Texas. We conducted limited-scope reviews of the remaining 13 AAs: Austin, Beaumont, Brownsville, Corpus Christi, Dallas, Fort Worth, Longview, McAllen, San Antonio, Texarkana, Tyler, Victoria, and Texas non-MSA.

Refer to Tables 1-15 in the Texas section of Appendix D for the facts and data that support all Test conclusions.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Texas is rated outstanding. Based on a full-scope review, the bank's performance in the Houston AA is excellent.

Lending Activity - Lending activity in the AA is excellent, considering the level of competition and the bank's small business lending focus. The bank's primary lending product in this AA is small loans to businesses. Small loans to businesses represented 92 percent of total loans in this AA. The bank ranks seventh among 97 depository institutions with a 1.94 percent deposit market share. For small loans to businesses, the bank ranks third with a 14 percent market share among 169 lenders. The two banks ahead of CONA are nationwide credit card lenders and have market shares of 30.2 and 15.9 percent, respectively. The bank ranks 39th in overall home mortgage lending with a 0.44 percent market share. There were 808 mortgage lenders in the AA reflecting strong competition.

Distribution of Loans by Income Level of the Geography – The overall geographic distribution of loans is excellent. The distribution of loans to geographies of different income levels for 2012/2013 is excellent. The distribution of both home mortgage loans and small loans to businesses is excellent. In 2011, the distribution of home mortgage lending was weaker and adequate overall due to poor home improvement lending and adequate home refinance lending. The distribution of small loans to businesses was excellent.

Distribution of Loans by Income Level of the Borrower – The distribution of loans by income level of the borrower for the evaluation period is adequate. For 2012/2013, the distribution of home mortgage loans is excellent. For 2012/2013, the data in Table 11 in the state of Texas section of Appendix D shows the percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) was well below the percentage of small business. However, revenue was not reported for approximately 63 percent of the small loans to businesses. Many of these were HSBC loans acquired by CONA and for which revenue data was not provided or credit cards for which business revenue is not considered in the underwriting. When considering only the 37 percent of loans with revenue reported, the percentage of small loans to small businesses (87 percent) exceeded the percentage of small businesses (72 percent). Because neither of these analyses provides a true representation of the bank's lending performance, we selected a statistically valid random sample of 60 loans without revenue reported in this AA and performed a borrower distribution based on the results of the sample. For this AA, 27 of the 60 loans (45 percent) in the sample were to businesses with gross annual revenues of \$1 million or less. This percentage (45 percent) was well below the percentage of small businesses (72 percent) and considered poor. The bank's market share to small businesses is below the bank's overall market share. For 2011, the distribution of home mortgage lending was weaker in home improvement and home refinance and considered good. The distribution of small loans to businesses was stronger than in 2012/2013 and considered good. The stronger performance is due to the bank's good distribution of loans to businesses of different sizes and excellent market share.

Community Development Lending – The bank originated a significantly positive level of CD loans. During the evaluation period, CONA originated 30 loans for \$241.4 million, which

represents 42 percent of allocated Tier One Capital. By dollars, 50 percent targeted affordable housing, 41 percent targeted economic development and revitalization efforts, and 9 percent targeted community services.

Product Innovation and Flexibility – CONA’s use of flexible loan programs had a positive impact on its Lending Test performance. During the evaluation period, the bank originated 324 loans under the DREAM and SUHIL programs, 97 FHA loans totaling \$12.9 million, and 18 SBA loans totaling \$3.2 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Lending Test in all of the AAs, with the exception of the McAllen, Texarkana, and Victoria AAs, is not inconsistent with the bank’s overall outstanding performance under the Lending Test in the Houston AA. In the McAllen, Texarkana, and Victoria AAs, the bank’s performance is weaker than its overall outstanding performance under the Lending Test in the Houston AA and considered good. The weaker performance is due to a lower level of CD lending. CONA’s performance in the limited-scope areas did not impact the overall Lending Test rating in Texas.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Investment Test in Texas is rated outstanding. Based on a full-scope review, the bank’s performance in the Houston AA is excellent.

CONA has an excellent level of qualified investments and grants, exhibits excellent responsiveness to the CD needs in this AA and makes extensive use of innovative and/or complex investments to support CD initiatives. During the current evaluation period, CONA made 150 investments and grants in the AA totaling \$97.2 million. Additionally, 15 prior period investments totaling \$74.2 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period investment dollar volume represents 29.9 percent of the bank’s allocated Tier One Capital. A substantial majority of the dollar volume of the bank’s investments targeted affordable housing for LMI individuals, a primary need in the AA. The bank’s current and prior period investment transactions were LIHTCs. These transactions are considered complex and provide new or rehabilitated affordable housing units.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Austin, Beaumont, Brownsville, Corpus Christi, Dallas, Fort Worth, McAllen, San Antonio, Texarkana, and Texas non-MSA AAs is not inconsistent with the bank’s overall outstanding performance under the Investment Test in the Houston AA. In the Longview, Tyler, and Victoria AAs, CONA’s performance is weaker than the bank’s overall outstanding performance under the Investment Test in the Houston AA and is considered very poor. The weaker performance is due to a lower amount of investments relative to the bank’s operations in the AA. CONA’s performance in the limited-scope areas did not impact the overall Investment Test rating in Texas.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Texas is rated high satisfactory. Based on a full-scope review, the bank's performance in the Houston AA is good.

Retail Banking Services - Retail delivery systems are accessible to geographies and individuals of different income levels. There are 51 branches in the Houston AA. The percentage of branches located low-income geographies exceeds, and the percentage of branches located in moderate-income geographies is below the percentage of population residing in those respective areas. CONA's alternative delivery systems, including ATMs, online and mobile banking, and phone banking services, are effective and provide additional delivery system availability and access to retail banking services. Branch closings during the evaluation period have not affected accessibility. There were no branch openings. Branch hours and services do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals.

Community Development Services – The bank provides an excellent level of CD services that are responsive to the identified financial education needs of the AA. Bank associates provided more than three thousand hours of service to 41 different organizations during the evaluation period. This work includes five activities where employees served as Board or committee members for five different CD organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Austin, Beaumont, Brownsville, Dallas, and Texarkana, and Tyler AAs is not inconsistent with the bank's overall high satisfactory performance under the Service Test in the Houston AA. In the McAllen and Texas non-MSA AAs, the bank's performance is excellent and stronger than the bank's overall high satisfactory performance under the Service Test in the Houston AA. In the Corpus Christi, Fort Worth, Longview, and Victoria AAs, the bank's performance is adequate and weaker than the bank's overall high satisfactory performance under the Service Test in the Houston AA. The bank's Service Test performance is weaker and poor for the San Antonio AA. Performance differences in the limited-scope areas are due to stronger or weaker branch distributions. CONA's performance in the limited-scope areas did not impact the overall Service Test rating in Texas.

State (Commonwealth) of Virginia

CRA Rating for Virginia:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- Excellent lending activity, considering the bank's limited presence, strong competition, and small business lending focus;
- Excellent geographic distribution of loans;
- The bank originated a significantly positive level of CD loans;
- Excellent level of CD investments that were responsive to AA needs;
- Retail delivery systems are reasonably accessible to geographies and individuals of different income levels; and
- An adequate level of CD services that are responsive to the needs of the bank's AA.

Description of Institution's Operations and Scope of Evaluation in Virginia

Outside of the Washington-Arlington-Alexandria MMA, CONA has defined two AAs within Virginia: the Charlottesville AA (Albemarle County and the City of Charlottesville) and the Virginia non-MSA AA, which consists of Culpeper County. The bank operates one branch in each AA. The bank had \$57 million in deposits (excluding allocated Internet deposits) and ranked 10th of 17 depository institutions with a 1.5 percent deposit market share. The deposits represent 0.03 percent of the bank's total domestic deposits.

In evaluating the state of Virginia, we conducted a full-scope review of the Charlottesville AA, as this AA accounted for 47 percent of the bank's deposits when excluding allocated Internet deposits, 70 percent of the bank's deposits when including allocated Internet deposits and 67 percent of the loans. We conducted a limited-scope review of the Virginia non-MSA AA. The bank's performance in this state had a minimal impact on its overall CRA rating.

Refer to Tables 1-15 in the Virginia section of Appendix D for the facts and data that support all Test conclusions.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Virginia is rated outstanding. Based on a full-scope review, the bank's performance in the Charlottesville AA is excellent.

Lending Activity - Lending activity in the AA is excellent, considering the bank's limited presence, competition within the AA for all types of loans, and the bank's focus on small business lending. The bank's primary lending product in this AA is small loans to businesses. Small loans to businesses represented 92 percent of total loans in this AA. The bank ranks 14th among 16 institutions in deposits with a 0.82 percent deposit market share. For small loans to businesses, the bank ranks second among 42 lenders with a 13.4 percent market share. The lender ahead of CONA is a nationwide credit card lender with a market share of 24.6 percent. In overall HMDA lending, the bank ranks 50th among 272 lenders with a market share of 0.18 percent. For all home mortgage products, the bank had a low volume of originations and minimal market shares, making an analysis not meaningful.

Distribution of Loans by Income Level of the Geography - The distribution of loans to geographies of different income levels for 2011 and 2012/2013 is excellent. The distribution of small loans to businesses is excellent. The volume of all home mortgage products in both 2011 and 2012/2013 did not provide for a meaningful analysis.

Distribution of Loans by Income Level of the Borrower – The distribution of loans by income level of the borrower for the evaluation period is adequate. For 2012/2013, the data in Table 11 in the state of Virginia section of Appendix D shows the percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) was well below the percentage of small business. However, revenue was not reported for approximately 70 percent of the small loans to businesses. Many of these were HSBC loans acquired by CONA and for which revenue data was not provided or credit cards for which business revenue is not considered in the underwriting. When considering only the 30 percent of loans with revenue reported, the percentage of small loans to small businesses (93 percent) exceeded the percentage of small businesses (70 percent). Because neither of these analyses provides a true representation of the bank's lending performance, we selected a statistically valid random sample of 60 loans without revenue reported in this AA and performed a borrower distribution based on the results of the sample. For this AA, 33 of the 60 loans (55 percent) in the sample were to businesses with gross annual revenues of \$1 million or less. This percentage (55 percent) was below the percentage of small businesses (70 percent) and considered adequate. The bank's market share to small businesses is below the bank's overall market share. For 2011, the distribution of small loans to businesses was not inconsistent with 2012/2013. The volume of all home mortgage products in both 2011 and 2012/2013 did not provide for a meaningful analysis.

Community Development Lending – The bank originated a significantly positive level of CD loans. CONA originated one loan for \$7.25 million, representing nearly 73 percent of allocated Tier One Capital. The loan was responsive to AA credit needs and will rehabilitate 202 units of affordable housing to LMI individuals.

Product Innovation and Flexibility – CONA’s use of flexible products had a neutral impact on the Lending Test.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank’s performance under the Lending Test in the Virginia non-MSA AA is weaker than the bank’s overall outstanding performance under the Lending Test in the Charlottesville AA and is considered good. The weaker performance is due to a lower level of CD lending in the AA. CONA’s performance in the limited-scope area did not impact the overall Lending Test rating in the Virginia.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

CONA’s performance under the Investment Test in Virginia is rated outstanding. Based on a full-scope review, the bank’s performance in the Charlottesville AA is excellent.

CONA has an excellent level of qualified investments and grants and exhibits excellent responsiveness to the CD needs in this AA. During the current evaluation period, CONA made 10 investments in the AA totaling \$8.5 million. Additionally, eight prior period investments totaling \$7.9 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period investment dollar volume represents over 100 percent of the bank’s allocated Tier One Capital. A substantial majority of the dollar volume of the bank’s investments targeted affordable housing for LMI individuals, a primary credit need in the AA.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank’s performance under the Investment Test in the Virginia non-MSA AA is significantly weaker than the bank’s overall outstanding performance under the Investment Test in the Charlottesville AA. The weaker performance is due to no current or prior period investments. There are very limited investment opportunities in the Virginia non-MSA AA. CONA’s performance in the limited-scope area did not impact the overall Investment Test rating in Virginia.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Service Test in Virginia is rated low satisfactory. Based on a full-scope review, the bank’s performance in the Charlottesville AA is adequate.

Retail Banking Services - Retail delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank has one branch in this market, which is located in a middle-income geography. CONA’s alternative delivery systems, including ATMs, online and mobile banking, and phone banking services, are effective and

provide additional delivery system availability and access to retail banking services. There were no branch openings or closings during the evaluation period.

Community Development Services - The bank provides an adequate level of CD services. Eleven associates provided 30 hours of service to three different organizations in the AA that meet the definition of CD.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Virginia non-MSA AA is not inconsistent with the bank's overall low satisfactory performance under the Service Test in the Charlottesville AA. CONA's performance in the limited-scope area did not impact the overall Service Test rating in Virginia.

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 nonmetropolitan 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”).

Time Period Reviewed	Lending Test: Investment Test: Service Test:	01/01/2011 to 12/31/2013 01/01/2011 to 12/31/2013 01/01/2011 to 12/31/2013
Financial Institution		Products Reviewed
Capital One, National Association (CONA) McLean, Virginia		Home Mortgage Loans Small Business Loans Letters of Credit Community Development Loans Community Development Investments Community Development Services
Subsidiary or Affiliate	Relationship	Products Reviewed
Beech Street Capital, LLC	Subsidiary	Community Development Loans
Capital One Bank, USA, National Association (COBNA)	Affiliate	Small Loans to Businesses and Farms
Capital One Community Development Corporation	Affiliate	Investments
Capital One Community Development Corporation II (COCDC II)	Subsidiary	Community Development Loans
Capital One Equipment Finance Corp.	Subsidiary	Small Loans to Businesses and Farms
Capital One Equipment Leasing, LLC	Subsidiary	Community Development Leases
Capital One Foundation	Affiliate	Investments (Grants)
Capital One MR New Markets, LLC	Subsidiary	Community Development Loans
Capital One NMTC Manager Inc.	Subsidiary	Community Development Loans
Capital One NA Low Income Housing Tax Credit, Inc.	Subsidiary	Investments
Capital One Municipal Funding, Inc.	Subsidiary	Community Development Loans
COCRF Investor 1-23, LLC	Subsidiary	Community Development Loans

List of Assessment Areas and Type of Examination			
Assessment Area	MSA # /MD#	Type of Exam	Other Information (Reflects counties/parishes in MSAs, MDs or non-MSA areas)
Multistate MSAs and States			
New York-Northern New Jersey-Long Island MMA	35620		
New York-White Plains-Wayne AA	35644	Full-Scope	In NJ: Bergen, Hudson, Passaic In NY: Bronx, Kings, New York, Queens, Richmond, Rockland, Westchester
Edison AA	20764	Limited-Scope	In NJ: Middlesex, Monmouth, Ocean, Somerset
Nassau-Suffolk AA	35004	Limited-Scope	In NY: Nassau, Suffolk
Newark AA	35084	Limited-Scope	In NJ: Essex, Morris, Union
Washington-Arlington-Alexandria MMA	47900		
Washington-Arlington-Alexandria AA	47894	Full-Scope	Washington DC In MD: Calvert, Charles, Prince George's In VA: Alexandria City, Arlington, City of Fairfax, City of Falls Church, City of Fredericksburg, City of Manassas, City of Manassas Park, Fairfax, Fauquier, Loudoun, Prince William, Spotsylvania, Stafford, Warren
Bethesda AA	13644	Limited-Scope	In MD: Frederick, Montgomery
LOUISIANA			
New Orleans AA	35380	Full-Scope	Jefferson, Orleans, St. Bernard, St. Charles, St. John the Baptist, St. Tammany
Alexandria AA	10780	Limited-Scope	Rapides
Baton Rouge AA	12940	Limited-Scope	Ascension, East Baton Rouge, Livingston, West Baton Rouge
Houma AA	26380	Limited-Scope	Lafourche, Terrebonne
Lafayette AA	29180	Limited-Scope	Lafayette
Lake Charles AA	29340	Limited-Scope	Calcasieu, Cameron
Monroe AA	33740	Limited-Scope	Ouachita
Shreveport AA	43340	Limited-Scope	Bossier, Caddo, De Soto
Louisiana non-MSA AA	99999	Limited-Scope	Allen, Assumption, Avoyelles, Claiborne, East Carroll, Iberia, Jefferson Davis, Madison, Morehouse, St. Mary, Tangipahoa, Vermillion, Washington, Webster, West Carroll
CONNECTICUT			
New Haven AA	35300	Full-Scope	New Haven
DELAWARE			
Sussex County non-MSA AA	99999	Full-Scope	Sussex

MARYLAND			
Baltimore AA	12580	Full-Scope	Anne Arundel, Baltimore, Carroll, City of Baltimore, Howard, Queen Anne's
Hagerstown AA	25180	Limited-Scope	Washington
Maryland non-MSA AA	99999	Limited-Scope	St. Mary's, Talbot
NEW JERSEY			
Trenton AA	45940	Full-Scope	Mercer
TEXAS			
Houston AA	26420	Full-scope	Austin, Fort Bend, Galveston, Harris, Montgomery
Austin AA	12420	Limited-scope	Travis, Williamson
Beaumont AA	13140	Limited-scope	Jefferson, Orange
Brownsville AA	15180	Limited-scope	Cameron
Corpus Christi AA	18580	Limited-scope	Nueces
Dallas AA	19124	Limited-scope	Collin, Dallas, Denton
Fort Worth AA	23104	Limited-scope	Tarrant
Longview AA	30980	Limited-scope	Gregg
McAllen AA	32580	Limited-scope	Hidalgo
San Antonio AA	41700	Limited-scope	Bexar, Guadalupe
Texarkana AA	45500	Limited-scope	Bowie
Tyler AA	46340	Limited-scope	Smith
Victoria AA	47020	Limited-scope	Calhoun, Victoria
Texas non-MSA AA	99999	Limited-scope	Anderson, Angelina, Camp, Cass, Cherokee, Colorado, Fayette, Harrison, Lamar, Lee, Matagorda, Nacogdoches, Washington, Wharton, Wood
VIRGINIA			
Charlottesville AA	16820	Full-scope	Albemarle, City of Charlottesville
Virginia non-MSA AA	99999	Limited-scope	Culpeper

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS Capital One, National Association (CONA)				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
CONA	Outstanding	Outstanding	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
New York-Northern New Jersey-Long Island MMA	Outstanding	Outstanding	High Satisfactory	Outstanding
Washington-Arlington-Alexandria MMA	Outstanding	Outstanding	High Satisfactory	Outstanding
Louisiana	Outstanding	Outstanding	High Satisfactory	Outstanding
Connecticut	Outstanding	Outstanding	Low Satisfactory	Outstanding
Delaware	Outstanding	Outstanding	Low Satisfactory	Outstanding
Maryland	Outstanding	Outstanding	High Satisfactory	Outstanding
New Jersey	Outstanding	Outstanding	Low Satisfactory	Outstanding
Texas	Outstanding	Outstanding	High Satisfactory	Outstanding
Virginia	Outstanding	Outstanding	Low Satisfactory	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Primary Rating Areas

New York-Northern New Jersey-Long Island MMA

New York-White Plains-Wayne AA

Demographic Information for Full-Scope Area: New York-White Plains-Wayne AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2,901	11.44	23.61	28.65	33.82	2.48
Population by Geography	11,476,541	12.99	25.46	26.13	35.20	0.21
Owner-Occupied Housing by Geography	1,688,800	2.52	12.46	27.79	57.23	0.00
Business by Geography	926,730	7.28	17.10	22.35	50.96	2.31
Farms by Geography	7,279	2.78	9.71	20.44	66.42	0.65
Family Distribution by Income Level	2,649,187	25.84	15.52	16.27	42.37	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	1,095,698	23.06	35.88	25.19	15.86	0.01
Median Family Income FFIEC Median Family Income for 2013 Households Below Poverty Level		\$64,171 \$66,000 16%	Median Housing Value (2013) Unemployment Rate (Dec. 2013)		\$465,700	7.1%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census, Bureau of Labor Statistics, National Association of Realtors-2013

CONA has defined this AA to include the following 10 counties in the New York-White Plains-Wayne MD: Bergen, Hudson, and Passaic counties in New Jersey and Bronx, Kings, New York, Queens, Richmond, Rockland, and Westchester counties in New York. The bank has no branches in Putnam County; therefore, it is not included in the bank's AA. The New York-White Plains-Wayne MD is within the New York-Northern New Jersey-Long Island, NY-NJ-PA MMA. The AA meets the legal requirements and does not arbitrarily exclude any LMI geographies.

New York City is the most significant economic contributor to the AA. New York City is home to a diversified mix of businesses, with many national and international corporations headquartered there. Historically, the downtown area has been dominated by the financial services industry. Industries operating in the midtown area include advertising, publishing, and garment production. The retail sector is a major employer along with health and social care. In addition, tourism continues to be one of New York City's most vital industries with more than 40 million tourists visiting the city annually. Some of the AA's largest employers are

Metropolitan Transportation Authority, New York City Health and Hospitals Corporation, New York Presbyterian Healthcare Systems, Citigroup, JPMorgan Chase, Verizon, and Federated Department Stores.

The New York City economy has struggled following the recession that began in late 2008. In addition, the economic disruption of Hurricane Sandy in October 2012 was significant. Post-Hurricane Sandy rebuilding, along with a number of large-scale mixed-use developments across the city, is propelling construction, which is one of the largest contributors to job growth in New York City. Much of the job growth has been on the low end of the wage spectrum with industries such as leisure, hospitality and retail contributing a disproportionate share of jobs. Industries that pay below-average wages have accounted for more than 70 percent of the net job growth since 2010, even though these industries make up only about 40 percent of all jobs. Wall Street's shrinkage has not helped. Wall Street, a significant contributor to employment in the area, suffered significant layoffs following the financial crisis and has yet to rebound.

According to the Bureau of Labor Statistics, the non-seasonally adjusted national unemployment rate was 6.7 percent as of December 31, 2013. The December 31, 2013 non-seasonally adjusted unemployment rate for the state of New York was 6.6 percent, the unemployment rate for the New York-Northern New Jersey-Long Island MMA was 6.6 percent, the unemployment rate for the New York-White Plains-Wayne MD was 7.1 percent and the unemployment rate for New York City was 7.5 percent. The unemployment rate for the greater MSA has more than doubled since 2006.

Housing prices have continued to decline. The National Association of Realtors reports that the median single-family housing value for the New York-White Plains-Wayne MD was approximately \$465 thousand in 2013, a decline from \$494 thousand in 2008. Of the approximately 1.7 million owner-occupied housing units, just two and one-half percent are in low-income CTs. Despite the drop in housing values, the high cost of living associated with this area continues to make home ownership difficult, especially for LMI individuals. The 2013 FFIEC median family income for the New York-White Plains-Wayne MD is \$66,000 and a low-income family earns less than \$33,000 and a moderate-income family earns less than \$52,800. Over 41 percent of the families in the MD are LMI. Additionally, as noted earlier, approximately 16 percent of the households in the MD are below the poverty level. The high cost of housing in New York City makes home ownership relatively unaffordable for LMI individuals or families. LMI individuals and families also have the challenge of accumulating a sufficient down payment. Further, there are significant disparities in the income levels throughout the counties that comprise the AA. New York County (Manhattan) is among the richest counties in the U.S. The Bronx and Kings counties have over 20 percent poverty rates. Lastly, this AA has significant investor and cash buyers that further challenge home buyers in this market.

CONA operates 185 branches in the New York-White Plains-Wayne AA. Based on the June 30, 2013 FDIC Summary of Deposit Market Share report, the bank ranks seventh out of 160 institutions with a 2.69 percent deposit market share in the New York-White Plains-Wayne AA. JPMorgan Chase dominated the market with a 40.54 percent deposit market share. The Bank of New York Mellon ranked second with a 10.21 percent deposit market share, Bank of America, N.A. ranked third with a 7.39 percent deposit market share, Citibank, N.A. ranked

fourth with a 6.48 percent deposit market share, and HSBC Bank USA, N.A. ranked fifth with a 5.59 percent deposit market share.

There are ample opportunities for CD involvement and participation in the AA. During this evaluation, OCC representatives met with various CD organizations that support economic development, small business development, and affordable housing and community services targeted toward LMI individuals and families. Through our contacts with these organizations and our discussions with CONA management, some of the most critical community needs include:

- creation and retention of affordable housing, both for purchase and rent, for LMI individuals;
- small business development;
- technical assistance and access to credit for entrepreneurs, small businesses, and microenterprises;
- transitional housing and related services for homeless individuals and families;
- neighborhood revitalization for LMI communities; and
- financial education for both adults and children.

Washington-Arlington-Alexandria MMA**Washington-Arlington-Alexandria AA**

Demographic Information for Full-Scope Area: Washington-Arlington-Alexandria AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,054	9.87	23.72	35.01	30.27	1.14
Population by Geography	4,309,476	8.84	23.11	36.37	31.45	0.24
Owner-Occupied Housing by Geography	1,005,474	3.81	18.73	40.23	37.23	0.00
Business by Geography	445,946	4.30	18.36	35.86	40.85	0.63
Farms by Geography	6,394	2.44	19.96	39.72	37.79	0.09
Family Distribution by Income Level	989,034	21.14	17.44	21.16	40.26	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	381,581	15.85	34.21	35.17	14.75	0.02
Median Family Income FFIEC Median Family Income for 2013 Households Below Poverty Level		\$100,890 \$105,900 7%	Median Housing Value (2013) Unemployment Rate (Dec. 2013)		\$381,900 4.6%	

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

Source: 2010 US Census and 2013 FFIEC MFI, Bureau of Labor Statistics, National Association of Realtors-2013

CONA has defined this AA to include the the portions of the Washington-Arlington-Alexandria MD the bank can reasonably serve, which includes the following counties and cities: Washington, DC; Calvert, Charles and Prince George's counties in Maryland; Arlington, Fairfax, Fauquier, Loudoun, Prince William, Spotsylvania and Stafford counties in Virginia; and the independent Virginia cities of Alexandria, Fairfax, Falls Church, Fredericksburg, Manassas and Manassas Park. The Washington-Arlington-Alexandria MD is within the Washington-Arlington-Alexandria DC-VA-MD-WV MMA. The AA meets the legal requirements and does not exclude any LMI geographies.

The recession did not adversely affect the AA economy as much as the rest of the country. The presence of the federal government helps to create a relatively stable employment base for the region. The Public Sector is the largest employer in the AA. Private employers include large healthcare providers such as Medstar and Inova and aerospace/defense contractors including Northrop Grumman, Science Applications International and Lockheed Martin. Other large private employers in the area include Booz Allen Hamilton, Marriott International and Verizon.

Unemployment rates traditionally run much lower than the national average in this area although the trends are generally similar. Budget sequestration in mid-2013 had a more significant impact in this area than it did nationally due to the high number of government and government-related private sector jobs. This is reflected in the increase in the unemployment rate beginning in April 2013, while national rates continued to decline in that same period. The relative impact of sequestration on the MMA is diffused by the fact that it impacts non-defense federal spending budgets nationwide. While unemployment levels rose, levels remained well below those in other parts of the country. According to the Bureau of Labor Statistics, the non-seasonally adjusted national unemployment rate was 6.7 percent as of December 31, 2013. The December 31, 2013 non-seasonally adjusted unemployment rate for the District of Columbia was 6.9 percent, and the unemployment rate for the Washington-Arlington-Alexandria MD was 4.6 percent.

Based on statistics from the National Association of Realtors, the median home price was \$382 thousand in 2013. This is below the pre-recession high of \$445.3 thousand that occurred in the second quarter of 2007. Of the just over one million owner-occupied housing units in the area, only 3.8 percent are in low-income CTs. Despite the drop in housing values, the high cost of living associated with this area continues to make home ownership difficult, especially for LMI individuals. The 2013 FFIEC median family income for the Washington-Arlington-Alexandria MD is nearly \$106 thousand, the highest in the country, and a low-income family earns less than \$52,950 and a moderate-income family earns less than \$84,720. The poverty level in the AA is seven percent, but is much higher at over 18 percent in the District of Columbia.

CONA operates 126 branches in the Washington-Arlington-Alexandria AA. Based on the June 30, 2013 FDIC Summary of Deposit Market Share report, CONA ranked fourth out of 78 institutions with a 10.19 percent deposit market share within the Washington-Arlington-Alexandria AA. E*TRADE Bank ranks first with a 20.77 percent deposit market share, Wells Fargo Bank, N.A. ranks second with a 13.64 percent deposit market share, and Bank of America, N.A. ranks third with a 10.51 percent deposit market share.

There are ample opportunities available for banks to address CD and credit needs in the area. The area is served by several CDFIs, CD entities, and nonprofit entities. During this evaluation, OCC representatives met with various CD organizations that support economic development, small business development, and affordable housing and community services targeted toward LMI individuals and families. Through our contacts with these organizations and our discussions with CONA management, some of the most critical community needs include:

- creation, preservation and rehabilitation of affordable housing (rental housing and revitalization);
- housing for special needs populations;
- foreclosure prevention services;
- loans for affordable housing construction and rehabilitation;
- financial education;
- small business development;
- technical assistance and access to credit for small businesses and microenterprises; and
- funding for nonprofit entities.

State of Louisiana

New Orleans AA

Demographic Information for Full-Scope Area: New Orleans AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	385	15.84	25.97	30.39	25.97	1.82
Population by Geography	1,144,722	8.57	23.27	38.46	29.43	0.27
Owner-Occupied Housing by Geography	265,081	4.48	17.89	41.88	35.74	0.00
Business by Geography	161,013	6.71	19.81	32.88	40.48	0.11
Farms by Geography	1,978	4.15	15.42	43.53	36.80	0.10
Family Distribution by Income Level	266,568	23.57	16.69	18.48	41.26	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	107,321	13.59	32.11	37.97	16.32	0.00
Median Family Income FFIEC Median Family Income for 2013 Households Below Poverty Level		\$59,246 \$60,300 15%	Median Housing Value (2013) Unemployment Rate (Dec. 2013)		\$164,700 4.6%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 FFIEC MFI, Bureau of Labor Statistics, National Association of Realtors-2013

The New Orleans AA consists of six of the seven parishes in the New Orleans-Metairie-Kenner MSA. The AA includes Jefferson, Orleans, St. Bernard, St. Charles, St. John the Baptist and St. Tammany parishes. The bank has no branches in Plaquemines Parish; therefore, this parish is not included in the bank’s AA. The AA meets the legal requirements and does not exclude any LMI geographies.

New Orleans continues its recovery from the impact of Hurricanes Rita and Katrina, which occurred in 2005 and the Deepwater Horizon oil spill that occurred in 2010. Although these events are still impacting the area, government assistance to address the problems has waned in the wake of other pressing economic concerns and the competing demand for FEMA funding from other areas of the country also recovering from natural disasters. A significant number of homes in low-income CTs were lost in the lower 9th Ward as a result of Hurricane Katrina, which remains largely blighted with only a small number of homes having been rebuilt. The number of owner-occupied units declined by 34,417 units between 2000 and 2010, including a decline of 3,177 units in LMI geographies.

Though employment in New Orleans is rising, the economy remains at risk of recession. Tourism and transportation, two of New Orleans' dominant industries, are underperforming. Fortunately, energy, which is the third dominant industry, is growing as rising oil prices boost extraction. Major employers include Naval Air Station Joint Reserve Base, Louisiana State University Health, Harrah's Entertainment, Northrop Grumman, and Ochsner Clinic.

According to the Bureau of Labor Statistics, the non-seasonally adjusted national unemployment rate was 6.7 percent as of December 31, 2013. The December 31, 2013 non-seasonally adjusted unemployment rate for the state of Louisiana was 4.7 percent and the unemployment rate for the New Orleans-Metairie-Kenner MSA was 4.6 percent. Unemployment rates are lower than the national average, although trends generally reflect national trends. With national unemployment rates slowing, the gap narrowed in 2013. However, this does not show the complete employment picture for the region. Unemployment rates are lower because the workforce is still 15 percent below pre-Katrina levels. Many left the area due to the loss of homes and/or jobs just after Katrina and nearly 100 thousand did not return. Additionally, the poverty rate in parts of this AA is significantly higher than statewide and national averages.

The National Association of Realtors reports that the median single-family housing value for the New Orleans-Metairie-Kenner MSA was nearly \$165 thousand in 2013. The 2013 FFIEC median family income for the MSA is \$60,300, and a low-income family earns less than \$30,150 and a moderate-income family earns less than \$48,240. The poverty level in the AA is 15 percent. Home ownership for LMI individuals and families would be difficult.

CONA operates 53 branches in the New Orleans AA. Based on the June 30, 2013 FDIC Summary of Deposit Market Share report, CONA ranks first out of 36 institutions with a 33.33 percent deposit market share. Whitney Bank ranked second with a 15.60 percent deposit market share and JPMorgan Chase ranked third with a 15.05 percent deposit market share.

There are a number of opportunities available for banks to address CD and credit needs in the area. During this evaluation, OCC representatives met with various CD organizations that support economic development, small business development, and affordable housing and community services targeted toward LMI individuals and families. Through our contacts with these organizations and our discussions with CONA management, some of the most critical community needs include:

- continuing assistance for homeowners whose homes were lost or damaged due to natural disasters;
- improving home ownership opportunities for LMI individuals and families;
- small business development;
- technical assistance and access to credit for small businesses;
- neighborhood revitalization;
- youth services, particularly for K-12 education; and
- financial education.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state and multistate metropolitan area. 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. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

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. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.

Table 1. Other Products - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, 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.

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.

Tables of Performance Data

New York-Northern New Jersey-Long Island MMA 5
Washington-Arlington-Alexandria MMA 20
State of Louisiana 35
State of Connecticut 50
State of Delaware 64
State of Maryland 77
State of New Jersey 92
State of Texas 106
State (Commonwealth) of Virginia 120

New York-Northern New Jersey-Long Island MMA

Table 1. Lending Volume

LENDING VOLUME		Geography: New York-Northern New Jersey-Long Island MMA						Evaluation Period: January 1, 2011 to December 31, 2013				
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)	
Full Review:												
New York-White Plains-Wayne	53.03	2,524	909,447	58,616	2,187,463	21	2,227	239	1,456,022	61,400	4,555,159	56.54
Limited Review:												
Edison	10.64	613	156,945	11,698	135,455	4	190	7	49,895	12,322	342,485	1.82
Nassau-Suffolk	28.00	2,264	505,584	30,096	1,190,022	27	2,458	26	175,154	32,413	1,873,218	36.01
Newark	8.33	546	200,922	9,083	174,555	0	0	13	91,214	9,642	466,691	5.64

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2013.

*** Deposit Data as of June 30, 2013, excluding allocated Internet deposits. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: New York-Northern New Jersey-Long Island MMA		Evaluation Period: January 1, 2011 to December 31, 2013	
Assessment Area:	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
New York-White Plains-Wayne	0	0	26	372,740	
Limited Review:					
Edison	0	0	0	0	
Nassau-Suffolk	0	0	2	33,553	
Newark	0	0	2	13,579	

* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2013.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: Home Purchase		Geography: New York-Northern New Jersey-Long Island MMA								Evaluation Period: January 1, 2012 to December 31, 2013					
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	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-White Plains-Wayne	484	40.57	2.52	4.55	12.46	19.21	27.79	24.17	57.23	52.07	0.43	0.64	0.45	0.46	0.40
Limited Review:															
Edison	116	9.72	4.15	6.90	16.48	18.97	49.73	43.97	29.64	30.17	0.27	0.62	0.32	0.28	0.21
Nassau-Suffolk	463	38.81	1.02	1.73	14.16	19.87	61.25	59.83	23.57	18.57	1.09	0.00	1.43	1.08	0.96
Newark	130	10.90	4.72	9.23	14.79	25.38	26.51	21.54	53.98	43.85	0.39	0.60	0.55	0.47	0.29

* Based on 2012 Peer Mortgage Data (USPR)

** 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 units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: Home Improvement		Geography: New York-Northern New Jersey-Long Island MMA								Evaluation Period: January 1, 2012 to December 31, 2013					
Assessment Area:	Total Home Improvement 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	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-White Plains-Wayne	253	39.59	2.52	6.32	12.46	29.64	27.79	21.34	57.23	42.69	2.25	0.00	3.22	3.11	1.90
Limited Review:															
Edison	104	16.28	4.15	15.38	16.48	58.65	49.73	18.27	29.64	7.69	0.58	1.35	0.52	0.80	0.21
Nassau-Suffolk	240	37.56	1.02	0.83	14.16	20.83	61.25	64.17	23.57	14.17	3.27	0.00	3.24	3.74	2.01
Newark	42	6.57	4.72	14.29	14.79	50.00	26.51	16.67	53.98	19.05	0.49	1.69	0.58	0.98	0.20

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: Home Mortgage Refinance Geography: New York-Northern New Jersey-Long Island MMA Evaluation Period: January 1, 2012 to December 31, 2013															
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	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-White Plains-Wayne	1,094	42.49	2.52	2.93	12.46	15.45	27.79	29.71	57.23	51.92	0.69	1.36	1.28	1.17	0.49
Limited Review:															
Edison	216	8.39	4.15	7.41	16.48	23.61	49.73	42.13	29.64	26.85	0.17	0.69	0.33	0.14	0.12
Nassau-Suffolk	1,038	40.31	1.02	1.35	14.16	16.18	61.25	65.80	23.57	16.67	1.84	5.69	2.70	1.98	1.11
Newark	227	8.82	4.72	8.37	14.79	23.35	26.51	19.38	53.98	48.90	0.32	1.17	1.05	0.32	0.22

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: Multifamily		Geography: New York-Northern New Jersey-Long Island MMA								Evaluation Period: January 1, 2012 to December 31, 2013					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-White Plains-Wayne	73	71.57	17.39	19.18	27.59	28.77	21.28	23.29	33.74	28.77	1.06	1.51	1.05	1.50	0.65
Limited Review:															
Edison	5	4.90	10.62	0.00	23.46	0.00	50.33	80.00	15.60	20.00	1.64	0.00	0.00	4.65	0.00
Nassau-Suffolk	11	10.78	7.87	0.00	28.60	9.09	51.08	54.55	12.45	36.36	2.06	0.00	0.00	2.00	5.26
Newark	13	12.75	29.84	15.38	30.91	15.38	22.02	7.69	17.23	61.54	2.43	1.79	1.23	1.54	12.50

* Based on 2012 Peer Mortgage Data (USPR)

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: Small Loans to Businesses Geography: New York-Northern New Jersey-Long Island MMA Evaluation Period: January 1, 2012 to December 31, 2013																
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	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
New York-White Plains-Wayne	41,774	52.71	7.28	8.08	17.10	19.31	22.35	27.04	50.96	45.57	9.58	12.31	11.95	10.54	7.65	
Limited Review:																
Edison	8,790	11.09	4.71	4.24	15.38	16.52	47.69	51.39	32.18	27.85	10.19	7.35	10.56	10.83	7.20	
Nassau-Suffolk	22,105	27.89	1.49	1.66	14.77	16.87	58.86	61.70	24.87	19.77	16.41	22.44	20.46	16.76	10.72	
Newark	6,580	8.30	11.20	12.08	17.75	18.92	22.75	24.21	47.97	44.79	10.63	18.35	13.65	10.58	7.88	

* Based on 2012 Peer Small Business Data -- US and PR

** 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 (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: Small Loans to Farms		Geography: New York-Northern New Jersey-Long Island MMA						Evaluation Period: January 1, 2012 to December 31, 2013							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-White Plains-Wayne	16	55.17	2.78	6.25	9.71	18.75	20.44	25.00	66.42	50.00	6.16	25.00	6.67	3.85	6.10
Limited Review:															
Edison	2	6.90	1.85	0.00	11.27	0.00	48.22	50.00	38.65	50.00	1.30	0.00	0.00	0.00	2.33
Nassau-Suffolk	11	37.93	1.85	0.00	19.06	18.18	61.76	72.73	17.33	9.09	6.59	0.00	0.00	10.42	5.56
Newark	0	0.00	3.34	0.00	8.08	0.00	25.53	0.00	63.05	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase		Geography: New York-Northern New Jersey-Long Island MMA								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-White Plains-Wayne	484	40.57	25.84	6.28	15.52	21.55	16.27	27.20	42.37	44.98	0.47	1.45	1.10	0.60	0.34
Limited Review:															
Edison	116	9.72	20.39	21.74	17.87	29.57	22.04	23.48	39.70	25.22	0.30	0.51	0.41	0.30	0.19
Nassau-Suffolk	463	38.81	19.01	15.33	18.46	35.64	23.77	21.17	38.76	27.86	1.21	2.67	1.54	0.85	1.01
Newark	130	10.90	24.36	18.46	16.64	37.69	18.62	20.77	40.38	23.08	0.43	0.93	0.56	0.40	0.35

* Based on 2012 Peer Mortgage Data (USPR)

** 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 Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement		Geography: New York-Northern New Jersey-Long Island MMA										Evaluation Period: January 1, 2012 to December 31, 2013				
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****	Overall	Low	Mod	Mid	Upp	
Full Review:																
New York-White Plains-Wayne	255	39.78	25.84	11.86	15.52	18.18	16.27	27.67	42.37	42.29	2.43	4.76	2.73	3.68	1.89	
Limited Review:																
Edison	104	16.22	20.39	24.04	17.87	38.46	22.04	19.23	39.70	18.27	0.61	0.99	0.86	0.39	0.52	
Nassau-Suffolk	240	37.44	19.01	19.17	18.46	30.42	23.77	28.75	38.76	21.67	3.41	6.01	5.80	2.92	1.96	
Newark	42	6.55	24.36	20.00	16.64	45.00	18.62	22.50	40.38	12.50	0.53	2.35	1.63	0.27	0.12	

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: New York-Northern New Jersey-Long Island MMA								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
New York-White Plains-Wayne	1,097	42.55	25.84	12.13	15.52	18.20	16.27	20.59	42.37	49.08	0.78	3.67	2.77	1.05	0.50
Limited Review:															
Edison	216	8.38	20.39	17.37	17.87	27.70	22.04	18.31	39.70	36.62	0.19	0.70	0.27	0.13	0.13
Nassau-Suffolk	1,038	40.26	19.01	14.58	18.46	27.51	23.77	28.76	38.76	29.15	2.07	3.62	3.20	1.98	1.43
Newark	227	8.81	24.36	22.47	16.64	20.70	18.62	19.38	40.38	37.44	0.37	2.09	0.81	0.35	0.21

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses		Geography: New York-Northern New Jersey-Long Island MMA			Evaluation Period: January 1, 2012 to December 31, 2013				
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	Rev\$ 1 Million or Less
Full Review:									
New York-White Plains-Wayne	42,506	53.13	72.37	33.85	94.38	2.19	3.42	9.58	7.27
Limited Review:									
Edison	8,790	10.99	73.30	25.64	98.58	0.56	0.86	10.19	5.15
Nassau-Suffolk	22,105	27.63	76.35	27.91	94.69	3.27	2.04	16.41	10.84
Newark	6,598	8.25	72.15	27.81	97.36	1.14	1.50	10.63	6.23

* Based on 2012 Peer Small Business Data -- US and PR

** 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 - 2013).

**** 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 63.48% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms		Geography: New York-Northern New Jersey-Long Island MMA			Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
New York-White Plains-Wayne	16	55.17	96.26	50.00	68.75	6.25	25.00	6.16	11.76
Limited Review:									
Edison	2	6.90	96.44	50.00	100.00	0.00	0.00	1.30	0.00
Nassau-Suffolk	11	37.93	96.70	45.45	81.82	0.00	18.18	6.59	17.65
Newark	0	0.00	96.53	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 24.14% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: New York-Northern New Jersey-Long Island MMA				Evaluation Period: January 1, 2011 to December 31, 2013					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
New York-White Plains-Wayne	77	357,307	786	398,819	863	756,126	79.76	0	0
Limited Review:									
Edison	7	13,843	21	12,351	28	26,194	2.76	0	0
Nassau-Suffolk	20	53,889	184	68,587	204	122,476	12.92	0	0
Newark	7	26,754	111	16,488	118	43,242	4.56	0	0

* 'Prior Period Investments' means investments made in a previous 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: New York-Northern New Jersey-Long Island MMA																	
Evaluation Period: January 1, 2011 to December 31, 2013																	
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
Full Review:																	
New York-White Plains-Wayne	56.54	182	55.49	3.85	21.43	26.37	48.35	4	8	1	1	- 7	1	12.99	25.46	26.13	35.20
Limited Review:																	
Edison	1.82	15	4.57	0.00	20.00	60.00	20.00	0	0	0	0	0	0	6.84	18.20	48.14	26.81
Nassau-Suffolk	36.01	114	34.76	0.00	12.28	70.18	17.54	0	3	0	0	- 1	- 2	2.32	17.95	58.87	20.71
Newark	5.64	17	5.18	5.88	17.65	29.41	47.06	0	3	0	- 1	0	- 2	15.00	24.04	22.36	38.34

*Three branches in the New York-White Plains-Wayne AA are not reflected on the table because they are located in a geography that has not been assigned an income level.

Washington-Arlington-Alexandria MMA

Table 1. Lending Volume

LENDING VOLUME		Geography: Washington-Arlington-Alexandria MMA						Evaluation Period: January 1, 2011 to December 31, 2013				
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)	
Full Review:												
Washington-Arlington-Alexandria	71.41	4,712	1,301,548	23,773	393,013	10	223	52	385,625	28,547	2,080,409	69.52
Limited Review:												
Bethesda	28.59	2,527	695,322	8,876	142,525	8	92	17	105,736	11,428	943,675	30.48

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2013.

*** Deposit Data as of June 30, 2013, excluding allocated and unallocated Internet deposits. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: Washington-Arlington-Alexandria MMA		Evaluation Period: January 1, 2011 to December 31, 2013	
Assessment Area:	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
Washington-Arlington-Alexandria	0	0	6	19,231	
Limited Review:					
Bethesda	0	0	2	487	

* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2013.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: Home Purchase		Geography: Washington-Arlington-Alexandria MMA								Evaluation Period: January 1, 2012 to December 31, 2013					
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington-Arlington-Alexandria	309	62.17	3.81	9.06	18.73	24.92	40.23	32.04	37.23	33.98	0.20	0.43	0.22	0.19	0.17
Limited Review:															
Bethesda	188	37.83	3.05	7.98	22.99	29.79	41.19	37.23	32.76	25.00	0.62	1.71	0.84	0.52	0.48

* Based on 2012 Peer Mortgage Data (USPR)

** 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 units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: Home Improvement		Geography: Washington-Arlington-Alexandria MMA								Evaluation Period: January 1, 2012 to December 31, 2013					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ¹				
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington-Arlington-Alexandria	135	50.75	3.81	3.70	18.73	19.26	40.23	32.59	37.23	44.44	0.83	0.88	0.90	0.57	1.05
Limited Review:															
Bethesda	131	49.25	3.05	7.63	22.99	45.04	41.19	29.01	32.76	18.32	2.18	2.17	2.36	2.28	1.96

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: Home Mortgage Refinance		Geography: Washington-Arlington-Alexandria MMA								Evaluation Period: January 1, 2012 to December 31, 2013					
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington-Arlington-Alexandria	2,761	67.24	3.81	5.83	18.73	24.63	40.23	31.69	37.23	37.85	0.88	2.05	1.65	0.77	0.71
Limited Review:															
Bethesda	1,345	32.76	3.05	4.39	22.99	26.69	41.19	35.24	32.76	33.68	1.43	3.22	2.22	1.33	1.15

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: Multifamily		Geography: Washington-Arlington-Alexandria MMA								Evaluation Period: January 1, 2012 to December 31, 2013					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% of MF Units ^{***}	% BANK Loans ^{****}	% MF Units ^{***}	% BANK Loans ^{****}	% MF Units ^{***}	% BANK Loans ^{****}	% MF Units ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington-Arlington-Alexandria	11	61.11	18.32	36.36	30.39	27.27	28.29	9.09	22.99	27.27	3.40	3.08	3.75	2.13	4.11
Limited Review:															
Bethesda	7	38.89	11.96	14.29	46.35	42.86	30.16	42.86	11.53	0.00	13.89	16.67	5.56	27.27	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: Small Loans to Businesses		Geography: Washington-Arlington-Alexandria MMA								Evaluation Period: January 1, 2012 to December 31, 2013					
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ¹				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington-Arlington-Alexandria	18,586	72.49	4.30	4.66	18.36	20.83	35.86	39.35	40.85	35.16	15.05	19.03	18.96	15.67	11.15
Limited Review:															
Bethesda	7,053	27.51	3.82	3.98	27.46	30.78	34.28	32.71	34.43	32.53	16.34	18.65	18.44	16.72	13.13

* Based on 2012 Peer Small Business Data -- US and PR

** 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 (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: Small Loans to Farms		Geography: Washington-Arlington-Alexandria MMA						Evaluation Period: January 1, 2012 to December 31, 2013							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms**	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington-Arlington-Alexandria	7	53.85	2.44	0.00	19.96	14.29	39.72	28.57	37.79	57.14	1.60	0.00	0.00	0.95	2.06
Limited Review:															
Bethesda	6	46.15	2.72	0.00	23.37	0.00	47.68	83.33	26.23	16.67	0.95	0.00	0.00	0.81	2.86

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase		Geography: Washington-Arlington-Alexandria MMA								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington-Arlington-Alexandria	309	62.17	21.14	20.78	17.44	25.97	21.16	21.10	40.26	32.14	0.22	0.25	0.28	0.19	0.20
Limited Review:															
Bethesda	188	37.83	20.78	20.97	17.55	21.51	21.88	27.96	39.78	29.57	0.69	1.01	0.55	0.82	0.56

* Based on 2012 Peer Mortgage Data (USPR)

** 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 Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement		Geography: Washington-Arlington-Alexandria MMA										Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ¹					
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp	
Full Review:																
Washington-Arlington-Alexandria	135	50.75	21.14	13.33	17.44	27.41	21.16	31.11	40.26	28.15	0.86	0.92	1.18	1.02	0.56	
Limited Review:																
Bethesda	131	49.25	20.78	16.79	17.55	35.88	21.88	22.90	39.78	24.43	2.27	2.94	3.27	1.15	2.33	

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Washington-Arlington-Alexandria MMA						Evaluation Period: January 1, 2012 to December 31, 2013							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ¹				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Washington-Arlington-Alexandria	2,761	67.24	21.14	15.97	17.44	23.38	21.16	25.39	40.26	35.26	1.12	2.35	1.58	1.08	0.84
Limited Review:															
Bethesda	1,345	32.76	20.78	18.75	17.55	24.05	21.88	25.17	39.78	32.04	1.74	3.69	2.48	1.51	1.25

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses		Geography: Washington-Arlington-Alexandria MMA			Evaluation Period: January 1, 2012 to December 31, 2013				
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 ¹	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Washington-Arlington-Alexandria	18,613	72.52	70.88	45.04	97.92	0.83	1.25	15.05	12.31
Limited Review:									
Bethesda	7,053	27.48	72.70	49.60	98.27	0.68	1.05	16.34	15.61

* Based on 2012 Peer Small Business Data -- US and PR

** 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 - 2013).

**** 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 47.51% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms		Geography: Washington-Arlington-Alexandria MMA				Evaluation Period: January 1, 2012 to December 31, 2013			
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share ¹	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Washington-Arlington-Alexandria	7	53.85	95.65	71.43	100.00	0.00	0.00	1.60	5.00
Limited Review:									
Bethesda	6	46.15	95.57	66.67	100.00	0.00	0.00	0.95	7.69

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 23.08% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Washington-Arlington-Alexandria MMA				Evaluation Period: January 1, 2011 to December 31, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Washington-Arlington-Alexandria	51	208,446	478	248,003	529	456,449	90.74	0	0
Limited Review:									
Bethesda	4	9,207	71	37,383	75	46,590	9.26	0	0

* 'Prior Period Investments' means investments made in a previous 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: Washington-Arlington-Alexandria MMA							
Evaluation Period: January 1, 2011 to December 31, 2013																	
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
Full Review:																	
Washington-Arlington-Alexandria	69.52	123	66.13	5.69	20.33	31.71	42.28	2	15	1	- 2	- 7	- 5	8.84	23.11	36.37	31.45
Limited Review:																	
Bethesda	30.48	63	33.87	9.52	34.92	31.75	23.81	0	4	0	- 2	- 1	- 1	6.10	28.33	37.49	28.08

*Three branches in the Washington-Arlington-Alexandria AA are not reflected on the table because they are located in a geography that has not been assigned an income level.

Louisiana

Table 1. Lending Volume

LENDING VOLUME		Geography: Louisiana						Evaluation Period: January 1, 2011 to December 31, 2013				
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)	
Full Review:												
New Orleans	38.88	3,019	337,980	13,473	384,251	33	1,375	53	241,275	16,578	964,881	54.46
Limited Review:												
Alexandria	3.05	410	33,719	886	32,613	4	568	2	21,000	1,302	87,900	2.15
Baton Rouge	17.50	1,517	184,906	5902	196,423	22	2,125	19	75,575	7,460	459,029	16.46
Houma	8.04	1,392	126,526	2022	82,213	12	356	2	7,550	3,428	216,645	5.98
Lafayette	5.30	314	35,456	1937	43,861	4	42	3	1,950	2,258	81,309	2.46
Lake Charles	5.10	671	55,737	1416	34,881	80	10,648	8	22,775	2,175	124,041	3.35
Monroe	2.53	179	16,665	893	16,140	1	24	5	28,372	1,078	61,201	1.05
Shreveport	8.35	764	56,128	2773	57,731	15	648	7	15,760	3,559	130,267	8.70
Louisiana Non-MSA	11.26	1,304	85,303	3221	64,764	268	36,887	8	35,485	4,801	222,439	5.39

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2013.

*** Deposit Data as of June 30, 2013, excluding allocated Internet deposits. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: Louisiana		Evaluation Period: January 1, 2011 to December 31, 2013	
Assessment Area:	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
New Orleans	0	0	1	2,535	
Limited Review:					
Alexandria	0	0	0	0	
Baton Rouge	0	0	0	0	
Houma	0	0	0	0	
Lafayette	0	0	1	100	
Lake Charles	0	0	0	0	
Monroe	0	0	0	0	
Shreveport	0	0	0	0	
Louisiana Non-MSA	0	0	0	0	

* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2013.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: Home Purchase		Geography: Louisiana								Evaluation Period: January 1, 2012 to December 31, 2013					
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	Overall	Low	Mod	Mid	Upp
Full Review:															
New Orleans	332	38.03	4.48	7.83	17.89	19.58	41.88	33.13	35.74	39.46	1.17	2.38	1.57	0.94	1.13
Limited Review:															
Alexandria	30	3.44	5.86	3.33	11.11	16.67	34.27	20.00	48.75	60.00	1.22	0.00	1.10	1.06	1.32
Baton Rouge	145	16.61	5.90	7.59	10.36	12.41	39.90	35.17	43.84	44.83	0.60	2.83	0.81	0.49	0.60
Houma	120	13.75	0.00	0.00	25.19	26.67	54.90	43.33	19.91	30.00	1.87	0.00	2.10	1.59	2.24
Lafayette	40	4.58	3.53	0.00	23.09	20.00	40.25	27.50	33.14	52.50	0.39	0.00	0.44	0.26	0.48
Lake Charles	65	7.45	4.91	15.38	17.46	29.23	48.44	36.92	29.19	18.46	0.88	5.00	1.02	0.88	0.65
Monroe	13	1.49	6.33	7.69	15.55	23.08	42.25	23.08	35.86	46.15	0.18	0.00	0.81	0.10	0.19
Shreveport	46	5.27	4.79	4.35	17.71	13.04	42.51	39.13	35.00	43.48	0.40	2.53	0.62	0.46	0.28
Louisiana Non-MSA	82	9.39	1.61	1.22	15.32	30.49	58.98	47.56	24.09	20.73	0.88	4.17	2.71	0.76	0.35

* Based on 2012 Peer Mortgage Data (USPR)

** 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 units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: Home Improvement			Geography: Louisiana								Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Home Improvement 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	Overall	Low	Mod	Mid	Upp
Full Review:															
New Orleans	508	32.23	4.48	10.63	17.89	38.39	41.88	29.92	35.74	21.06	14.37	11.70	16.36	17.25	10.87
Limited Review:															
Alexandria	67	4.25	5.86	11.94	11.11	23.88	34.27	23.88	48.75	40.30	11.29	28.57	21.05	9.41	10.22
Baton Rouge	233	14.78	5.90	17.60	10.36	24.03	39.90	35.62	43.84	22.75	7.64	5.71	9.59	10.43	5.33
Houma	219	13.90	0.00	0.00	25.19	35.16	54.90	44.29	19.91	20.55	22.43	0.00	18.64	22.58	25.58
Lafayette	53	3.36	3.53	5.66	23.09	45.28	40.25	30.19	33.14	18.87	5.25	0.00	1.14	7.59	5.67
Lake Charles	93	5.90	4.91	12.90	17.46	21.51	48.44	36.56	29.19	29.03	16.67	35.71	17.86	15.03	15.84
Monroe	42	2.66	6.33	0.00	15.55	42.86	42.25	30.95	35.86	26.19	5.91	0.00	10.71	6.09	4.29
Shreveport	136	8.63	4.79	6.62	17.71	24.26	42.51	44.85	35.00	24.26	14.79	15.38	15.09	17.24	11.48
Louisiana Non-MSA	225	14.28	1.61	4.00	15.32	24.00	58.98	59.11	24.09	12.89	9.75	27.27	8.81	11.14	5.76

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: Home Mortgage Refinance			Geography: Louisiana						Evaluation Period: January 1, 2012 to December 31, 2013						
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	Overall	Low	Mod	Mid	Upp
Full Review:															
New Orleans	1,192	31.34	4.48	5.45	17.89	23.57	41.88	35.07	35.74	35.91	2.94	4.36	5.36	3.15	2.20
Limited Review:															
Alexandria	146	3.84	5.86	2.05	11.11	13.70	34.27	30.82	48.75	53.42	3.81	2.94	4.42	4.39	3.51
Baton Rouge	642	16.88	5.90	4.52	10.36	17.13	39.90	38.94	43.84	39.41	2.11	4.26	3.88	2.52	1.66
Houma	596	15.67	0.00	0.00	25.19	27.35	54.90	46.81	19.91	25.84	9.03	0.00	10.60	8.95	8.26
Lafayette	119	3.13	3.53	0.84	23.09	30.25	40.25	32.77	33.14	36.13	1.45	0.00	3.01	1.39	1.00
Lake Charles	237	6.23	4.91	4.22	17.46	22.78	48.44	41.35	29.19	31.65	4.57	8.33	8.70	4.07	3.92
Monroe	68	1.79	6.33	1.47	15.55	11.76	42.25	39.71	35.86	47.06	1.62	0.00	1.93	1.53	1.67
Shreveport	288	7.57	4.79	2.78	17.71	18.06	42.51	47.22	35.00	31.94	2.31	8.93	4.98	3.15	1.42
Louisiana Non-MSA	515	13.54	1.61	0.39	15.32	14.17	58.98	61.36	24.09	24.08	4.47	5.88	5.49	4.86	3.44

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: Multifamily		Geography: Louisiana										Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
New Orleans	7	36.84	15.08	14.29	30.85	14.29	29.29	14.29	24.79	57.14	4.63	7.14	0.00	3.23	9.09	
Limited Review:																
Alexandria	0	0.00	10.76	0.00	12.48	0.00	16.32	0.00	60.44	0.00	0.00	0.00	0.00	0.00	0.00	
Baton Rouge	4	21.05	21.47	50.00	18.80	0.00	20.34	25.00	39.38	25.00	2.04	0.00	0.00	9.09	0.00	
Houma	3	15.79	0.00	0.00	27.02	33.33	58.71	66.67	14.27	0.00	14.29	0.00	33.33	13.33	0.00	
Lafayette	2	10.53	2.59	0.00	28.95	50.00	40.63	50.00	27.84	0.00	8.00	0.00	8.33	9.09	0.00	
Lake Charles	1	5.26	11.65	0.00	43.57	100.00	25.69	0.00	19.09	0.00	0.00	0.00	0.00	0.00	0.00	
Monroe	0	0.00	9.71	0.00	21.26	0.00	32.80	0.00	36.23	0.00	0.00	0.00	0.00	0.00	0.00	
Shreveport	1	5.26	7.92	100.00	31.89	0.00	38.03	0.00	22.16	0.00	0.00	0.00	0.00	0.00	0.00	
Louisiana Non-MSA	1	5.26	3.96	0.00	25.52	0.00	51.96	100.00	18.57	0.00	4.76	0.00	0.00	7.14	0.00	

* Based on 2012 Peer Mortgage Data (USPR)

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: Small Loans to Businesses												Geography: Louisiana					Evaluation Period: January 1, 2012 to December 31, 2013				
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						
Full Review:																					
New Orleans	10,377	41.63	6.71	7.52	19.81	20.57	32.88	32.73	40.48	39.18	27.43	31.30	29.89	28.08	22.78						
Limited Review:																					
Alexandria	703	2.82	10.99	10.24	12.75	13.09	29.32	31.44	46.63	45.23	18.82	21.84	23.98	20.68	14.34						
Baton Rouge	4,367	17.52	8.38	9.78	14.29	13.99	33.12	36.55	44.17	39.68	20.94	30.06	27.38	22.29	15.53						
Houma	1,550	6.22	0.00	0.00	25.34	26.71	53.64	52.52	21.02	20.77	29.62	0.00	30.64	29.03	22.79						
Lafayette	1,464	5.87	3.46	4.03	22.98	21.45	42.59	43.78	30.84	30.74	15.63	24.20	13.27	15.63	12.85						
Lake Charles	1,130	4.53	6.30	7.35	26.27	27.08	42.33	39.47	24.93	26.11	23.55	33.75	24.29	20.71	19.38						
Monroe	663	2.66	12.13	13.57	20.42	20.97	34.32	34.24	32.95	31.22	16.79	15.69	24.28	13.27	12.32						
Shreveport	2,149	8.62	12.17	12.24	22.71	21.13	35.25	35.74	29.76	30.90	21.02	23.23	24.17	19.65	16.53						
Louisiana Non-MSA	2,524	10.13	1.46	1.55	19.73	18.74	56.53	55.31	22.29	24.41	23.59	48.33	22.42	21.75	17.96						

* Based on 2012 Peer Small Business Data -- US and PR

** 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 (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: Small Loans to Farms		Geography: Louisiana								Evaluation Period: January 1, 2012 to December 31, 2013					
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
New Orleans	19	6.76	4.15	10.53	15.42	15.79	43.53	47.37	36.80	26.32	16.22	50.00	25.00	18.18	5.56
Limited Review:															
Alexandria	2	0.71	2.71	0.00	7.22	0.00	33.63	0.00	56.43	100.00	0.00	0.00	0.00	0.00	0.00
Baton Rouge	16	5.69	5.98	12.50	8.67	6.25	37.38	56.25	47.98	25.00	17.50	100.00	100.00	9.09	13.33
Houma	7	2.49	0.00	0.00	21.27	28.57	55.21	42.86	23.52	28.57	18.18	0.00	20.00	14.29	33.33
Lafayette	4	1.42	1.83	0.00	22.50	0.00	41.33	25.00	34.33	75.00	11.11	0.00	0.00	0.00	25.00
Lake Charles	54	19.22	1.57	0.00	14.96	3.70	50.39	66.67	33.07	29.63	40.00	0.00	0.00	38.10	46.15
Monroe	1	0.36	2.90	0.00	10.37	0.00	42.74	0.00	43.78	100.00	0.00	0.00	0.00	0.00	0.00
Shreveport	11	3.91	5.23	0.00	16.26	9.09	44.24	54.55	34.27	36.36	12.07	0.00	0.00	17.86	9.09
Louisiana Non-MSA	167	59.43	0.47	1.20	12.82	5.39	62.24	61.08	24.47	32.34	21.43	0.00	16.28	17.31	27.68

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase		Geography: Louisiana								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
New Orleans	332	38.03	23.57	14.11	16.69	21.94	18.48	19.75	41.26	44.20	1.26	1.98	1.06	1.19	1.28
Limited Review:															
Alexandria	30	3.44	23.55	10.34	16.42	13.79	17.38	20.69	42.64	55.17	1.36	2.08	1.30	0.57	1.67
Baton Rouge	145	16.61	22.10	10.87	16.56	21.74	18.46	25.36	42.88	42.03	0.66	0.71	0.50	0.65	0.78
Houma	120	13.75	25.31	11.97	15.26	18.80	18.26	23.08	41.16	46.15	1.98	4.09	1.01	1.90	2.15
Lafayette	40	4.58	22.99	12.50	16.47	20.00	17.65	22.50	42.89	45.00	0.43	0.00	0.19	0.51	0.59
Lake Charles	65	7.45	23.31	24.62	17.53	20.00	17.61	24.62	41.55	30.77	0.95	1.67	1.02	0.84	0.79
Monroe	13	1.49	23.93	16.67	16.05	33.33	18.50	8.33	41.52	41.67	0.20	0.96	0.00	0.00	0.32
Shreveport	46	5.27	23.59	8.70	16.42	26.09	18.56	26.09	41.42	39.13	0.46	0.71	0.82	0.31	0.37
Louisiana Non-MSA	82	9.39	23.94	7.41	16.10	28.40	17.81	29.63	42.15	34.57	0.96	1.43	1.41	1.27	0.56

* Based on 2012 Peer Mortgage Data (USPR)

** 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 Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement		Geography: Louisiana								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
New Orleans	508	32.23	23.57	20.40	16.69	27.33	18.48	23.76	41.26	28.51	15.34	22.22	19.64	15.51	11.68
Limited Review:															
Alexandria	67	4.25	23.55	14.93	16.42	25.37	17.38	29.85	42.64	29.85	12.12	8.33	26.09	16.42	7.69
Baton Rouge	233	14.78	22.10	16.96	16.56	26.96	18.46	24.35	42.88	31.74	8.03	9.00	9.44	8.30	7.19
Houma	219	13.90	25.31	14.68	15.26	17.89	18.26	22.02	41.16	45.41	24.53	20.00	30.19	25.00	24.00
Lafayette	53	3.36	22.99	20.75	16.47	43.40	17.65	13.21	42.89	22.64	5.60	5.00	12.31	4.49	3.87
Lake Charles	93	5.90	23.31	22.58	17.53	19.35	17.61	25.81	41.55	32.26	17.42	17.39	13.79	25.00	14.93
Monroe	42	2.66	23.93	14.63	16.05	12.20	18.50	31.71	41.52	41.46	6.06	10.53	3.70	10.87	3.77
Shreveport	136	8.63	23.59	13.24	16.42	21.32	18.56	28.68	41.42	36.76	15.55	11.59	25.33	19.67	11.57
Louisiana Non-MSA	225	14.28	23.94	4.44	16.10	16.89	17.81	25.78	42.15	52.89	10.28	4.50	5.06	11.36	12.35

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.5% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Louisiana						Evaluation Period: January 1, 2012 to December 31, 2013							
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 ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
New Orleans	1,192	31.34	23.57	9.86	16.69	21.36	18.48	24.96	41.26	43.83	3.38	6.27	5.17	3.42	2.69
Limited Review:															
Alexandria	146	3.84	23.55	8.22	16.42	17.81	17.38	28.77	42.64	45.21	4.54	6.25	6.37	6.40	3.51
Baton Rouge	642	16.88	22.10	8.66	16.56	21.57	18.46	27.24	42.88	42.52	2.37	2.79	3.57	2.89	1.85
Houma	596	15.67	25.31	5.08	15.26	16.44	18.26	25.93	41.16	52.54	10.15	8.76	12.41	10.46	9.70
Lafayette	119	3.13	22.99	7.63	16.47	23.73	17.65	25.42	42.89	43.22	1.70	3.40	2.86	2.12	1.17
Lake Charles	237	6.23	23.31	11.02	17.53	16.10	17.61	29.24	41.55	43.64	5.10	7.43	5.28	6.50	4.10
Monroe	68	1.79	23.93	7.46	16.05	23.88	18.50	20.90	41.52	47.76	1.86	3.61	3.44	1.83	1.48
Shreveport	288	7.57	23.59	9.06	16.42	22.30	18.56	32.40	41.42	36.24	2.92	5.60	5.74	4.16	1.83
Louisiana Non-MSA	515	13.54	23.94	3.51	16.10	15.01	17.81	24.17	42.15	57.31	5.13	3.17	6.01	6.55	4.73

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses		Geography: Louisiana			Evaluation Period: January 1, 2012 to December 31, 2013				
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	Rev\$ 1 Million or Less
Full Review:									
New Orleans	10,388	41.64	58.83	46.04	95.99	1.71	2.30	27.43	25.71
Limited Review:									
Alexandria	704	2.82	59.94	33.52	94.46	1.99	3.55	18.82	11.57
Baton Rouge	4,368	17.51	59.34	44.09	94.94	1.74	3.32	20.94	23.41
Houma	1,550	6.21	55.78	44.71	92.26	3.94	3.81	29.62	33.98
Lafayette	1,466	5.88	60.93	34.79	96.32	1.30	2.39	15.63	14.85
Lake Charles	1,132	4.54	55.14	43.46	96.64	1.59	1.77	23.55	24.89
Monroe	666	2.67	59.82	33.63	98.05	0.90	1.05	16.79	11.55
Shreveport	2,151	8.62	57.89	46.12	96.93	1.53	1.53	21.02	23.43
Louisiana Non-MSA	2,524	10.12	55.25	35.97	97.42	1.11	1.47	23.59	20.81

* Based on 2012 Peer Small Business Data -- US and PR

** 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 - 2013).

**** 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 49.50% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms		Geography: Louisiana			Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
New Orleans	19	6.76	97.17	78.95	89.47	0.00	10.53	16.22	23.81
Limited Review:									
Alexandria	2	0.71	95.71	50.00	50.00	0.00	50.00	0.00	0.00
Baton Rouge	16	5.69	97.95	43.75	81.25	6.25	12.50	17.50	16.67
Houma	7	2.49	97.14	100.00	85.71	14.29	0.00	18.18	33.33
Lafayette	4	1.42	98.50	100.00	100.00	0.00	0.00	11.11	50.00
Lake Charles	54	19.22	98.03	88.89	64.81	16.67	18.52	40.00	43.33
Monroe	1	0.36	98.76	100.00	100.00	0.00	0.00	0.00	0.00
Shreveport	11	3.91	97.39	72.73	90.91	9.09	0.00	12.07	19.35
Louisiana Non-MSA	167	59.43	97.71	82.63	58.68	23.95	17.37	21.43	37.61

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 7.47% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Louisiana				Evaluation Period: January 1, 2011 to December 31, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
New Orleans	23	118,814	261	62,476	284	181,290	40.00	0	0
Limited Review:									
Alexandria	2	4,819	24	183	26	5,002	1.10	0	0
Baton Rouge	12	31,940	111	66,401	123	98,341	21.70	0	0
Houma	0	0	9	115	9	115	0.03	0	0
Lafayette	2	5,867	24	19,602	26	25,469	5.62	0	0
Lake Charles	3	8,626	35	24,641	38	33,267	7.34	0	0
Monroe	1	5,031	19	8,613	20	13,644	3.01	0	0
Shreveport	4	6,517	54	28,643	58	35,160	7.76	0	0
Louisiana Non-MSA	3	21,503	19	39,436	22	60,939	13.45	0	0

* 'Prior Period Investments' means investments made in a previous 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: Louisiana Evaluation Period: January 1, 2011 to December 31, 2013																	
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
Full Review:																	
New Orleans	54.46	53	29.61	3.77	22.64	30.19	43.40	2	5	1	- 1	- 1	- 2	8.57	23.27	38.46	29.43
Limited Review:																	
Alexandria	2.15	8	4.47	37.50	0.00	25.00	37.50	0	1	0	0	0	- 1	9.04	15.76	32.85	42.34
Baton Rouge	16.46	28	15.64	3.57	21.43	39.29	35.71	0	1	0	0	0	- 1	11.27	13.42	37.54	37.77
Houma	5.98	14	7.82	0.00	21.43	50.00	28.57	0	1	0	0	- 1	0	0.00	27.11	54.30	18.60
Lafayette	2.46	7	3.91	0.00	28.57	57.14	14.29	0	1	0	0	- 1	0	4.60	25.78	39.44	30.18
Lake Charles	3.35	10	5.59	10.00	30.00	50.00	10.00	0	4	0	- 2	- 1	- 1	7.52	21.66	44.10	26.72
Monroe	1.05	4	2.23	0.00	50.00	25.00	25.00	0	0	0	0	0	0	10.26	23.23	36.63	29.87
Shreveport	8.70	21	11.73	19.05	23.81	42.86	14.29	0	3	0	- 1	- 2	0	8.62	23.66	39.08	28.64
Louisiana Non-MSA	5.39	34	18.99	0.00	29.41	52.94	17.65	0	0	0	0	0	0	2.25	18.24	57.47	22.04

Connecticut

Table 1. Lending Volume

LENDING VOLUME		Geography: Connecticut						Evaluation Period: January 1, 2011 to December 31, 2013				
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)	
Full Review:												
New Haven	100.00	122	39,350	4,267	21,492	0	0	2	20,300	4,391	81,142	100.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2013.

*** Deposit Data as of June 30, 2013, excluding allocated Internet deposits. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: Home Purchase		Geography: Connecticut								Evaluation Period: January 1, 2012 to December 31, 2013					
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	Overall	Low	Mod	Mid	Upp
Full Review:															
New Haven	17	100.00	3.46	5.88	16.65	47.06	40.50	41.18	39.39	5.88	0.10	0.00	0.45	0.06	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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 units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: Home Improvement		Geography: Connecticut								Evaluation Period: January 1, 2012 to December 31, 2013					
Assessment Area:	Total Home Improvement 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	Overall	Low	Mod	Mid	Upp
Full Review:															
New Haven	3	100.00	3.46	0.00	16.65	0.00	40.50	33.33	39.39	66.67	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: Home Mortgage Refinance		Geography: Connecticut								Evaluation Period: January 1, 2012 to December 31, 2013					
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	Overall	Low	Mod	Mid	Upp
Full Review:															
New Haven	78	100.00	3.46	5.13	16.65	46.15	40.50	25.64	39.39	23.08	0.12	0.34	0.46	0.12	0.04

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: Connecticut								Evaluation Period: January 1, 2012 to December 31, 2013					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
New Haven	2	100.00	19.68	0.00	30.98	50.00	37.19	0.00	12.16	50.00	2.11	0.00	3.45	0.00	6.25

* Based on 2012 Peer Mortgage Data (USPR)

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: Small Loans to Businesses															Geography: Connecticut					Evaluation Period: January 1, 2012 to December 31, 2013				
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									
Full Review:																								
New Haven	3,198	100.00	8.41	9.60	15.43	16.70	38.62	40.06	37.53	33.65	14.23	18.89	17.59	14.16	10.53									

* Based on 2012 Peer Small Business Data -- US and PR

** 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 (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: Small Loans to Farms		Geography: Connecticut										Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms**	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
New Haven	0	0.00	3.17	0.00	12.22	0.00	32.89	0.00	51.72	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase		Geography: Connecticut								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
New Haven	17	100.00	22.94	41.18	16.70	35.29	19.78	11.76	40.59	11.76	0.11	0.32	0.18	0.00	0.04

* Based on 2012 Peer Mortgage Data (USPR)

** 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 Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement		Geography: Connecticut								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
New Haven	3	100.00	22.94	0.00	16.70	33.33	19.78	0.00	40.59	66.67	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Connecticut								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
New Haven	78	100.00	22.94	27.03	16.70	39.19	19.78	17.57	40.59	16.22	0.12	0.60	0.32	0.06	0.02

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 5.1% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses		Geography: Connecticut			Evaluation Period: January 1, 2012 to December 31, 2013				
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	Rev\$ 1 Million or Less
Full Review:									
New Haven	3,198	100.00	72.71	19.51	99.81	0.13	0.06	14.23	5.54

* Based on 2012 Peer Small Business Data -- US and PR

** 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 - 2013).

**** 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 77.05% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms		Geography: Connecticut				Evaluation Period: January 1, 2012 to December 31, 2013			
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
New Haven	0	0.00	96.89	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Connecticut				Evaluation Period: January 1, 2011 to December 31, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
New Haven	6	8,116	9	4,755	15	12,871	100.00	0	0

* 'Prior Period Investments' means investments made in a previous 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: Connecticut		Evaluation Period: January 1, 2011 to December 31, 2013	
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		
Full Review:																			
New Haven	100.00	1	100.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	11.07	21.98	35.57	31.38		

Delaware

Table 1. Lending Volume

LENDING VOLUME		Geography: Delaware						Evaluation Period: January 1, 2011 to December 31, 2013				
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)	
Full Review:												
Sussex County Non-MSA	100.00	125	25,390	1,037	5,241	3	52	1	8,500	1,166	39,183	100.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2013.

*** Deposit Data as of June 30, 2013, excludes allocated Internet deposits. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: Home Purchase		Geography: Delaware									Evaluation Period: January 1, 2012 to December 31, 2013				
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Sussex County Non-MSA	28	100.00	0.00	0.00	11.84	10.71	73.46	64.29	14.70	25.00	0.36	0.00	0.61	0.36	0.28

* Based on 2012 Peer Mortgage Data (USPR)

** 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 units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: Home Improvement		Geography: Delaware								Evaluation Period: January 1, 2012 to December 31, 2013					
Assessment Area:	Total Home Improvement 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	Overall	Low	Mod	Mid	Upp
Full Review:															
Sussex County Non-MSA	2	100.00	0.00	0.00	11.84	50.00	73.46	50.00	14.70	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: Home Mortgage Refinance		Geography: Delaware								Evaluation Period: January 1, 2012 to December 31, 2013					
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Sussex County Non-MSA	72	100.00	0.00	0.00	11.84	12.50	73.46	66.67	14.70	20.83	0.45	0.00	1.23	0.39	0.43

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: Small Loans to Businesses			Geography: Delaware						Evaluation Period: January 1, 2012 to December 31, 2013						
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
Full Review:															
Sussex County Non-MSA	801	100.00	0.00	0.00	12.80	16.60	68.81	64.92	18.39	18.48	15.98	0.00	20.71	14.23	9.31

* Based on 2012 Peer Small Business Data -- US and PR

** 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 (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: Small Loans to Farms		Geography: Delaware						Evaluation Period: January 1, 2012 to December 31, 2013							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total **	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Sussex County Non-MSA	3	100.00	0.00	0.00	16.20	33.33	75.34	66.67	8.46	0.00	2.22	0.00	7.14	1.47	0.00

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase		Geography: Delaware								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Sussex County Non-MSA	28	100.00	19.57	10.71	18.97	35.71	21.51	7.14	39.94	46.43	0.40	0.81	1.05	0.13	0.31

* Based on 2012 Peer Mortgage Data (USPR)

** 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 Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement		Geography: Delaware								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Sussex County Non-MSA	2	100.00	19.57	0.00	18.97	50.00	21.51	0.00	39.94	50.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Delaware								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Sussex County Non-MSA	72	100.00	19.57	13.89	18.97	20.83	21.51	15.28	39.94	50.00	0.52	1.01	0.66	0.55	0.46

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses		Geography: Delaware			Evaluation Period: January 1, 2012 to December 31, 2013				
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	Rev\$ 1 Million or Less
Full Review:									
Sussex County Non-MSA	801	100.00	73.26	26.09	99.88	0.00	0.12	15.98	7.20

* Based on 2012 Peer Small Business Data -- US and PR

** 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 - 2013).

**** 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 69.91% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms		Geography: Delaware				Evaluation Period: January 1, 2012 to December 31, 2013			
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Sussex County Non-MSA	3	100.00	97.73	66.67	100.00	0.00	0.00	2.22	3.85

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Delaware				Evaluation Period: January 1, 2011 to December 31, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Sussex County Non-MSA	2	555	9	3,912	11	4,467	100.00	0	0

* 'Prior Period Investments' means investments made in a previous 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: Delaware		Evaluation Period: January 1, 2011 to December 31, 2013			
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		
Full Review:																			
Sussex County Non-MSA	100.00	1	100.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	14.77	73.16	12.07		

Maryland

Table 1. Lending Volume

LENDING VOLUME		Geography: Maryland								Evaluation Period: January 1, 2011 to December 31, 2013			
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)		
Full Review:													
Baltimore	88.61	1,255	304,092	11,053	99,065	15	148	14	94,092	12,337	497,397	90.75	
Limited Review:													
Hagerstown	5.95	60	7,287	765	3,307	3	28	1	3,382	829	14,004	4.33	
Maryland Non-MSA	5.44	57	13,806	696	3,362	2	2	2	2,863	757	20,033	4.93	

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2013.

*** Deposit Data as of June 30, 2013, excludes allocated Internet deposits. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: Maryland		Evaluation Period: January 1, 2011 to December 31, 2013	
Assessment Area:	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
Baltimore	0	0	1		3,539
Limited Review:					
Hagerstown	0	0	0		0
Maryland Non-MSA	0	0	1		2,262

* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2013.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: Home Purchase		Geography: Maryland								Evaluation Period: January 1, 2012 to December 31, 2013					
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore	109	85.83	6.23	6.42	17.26	19.27	37.77	28.44	38.74	45.87	0.17	0.23	0.30	0.14	0.16
Limited Review:															
Hagerstown	8	6.30	1.49	0.00	13.28	37.50	51.66	62.50	33.57	0.00	0.24	0.00	0.44	0.34	0.00
Maryland Non-MSA	10	7.87	0.00	0.00	5.94	20.00	34.60	50.00	59.46	30.00	0.24	0.00	1.21	0.42	0.06

* Based on 2012 Peer Mortgage Data (USPR)

** 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 units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: Home Improvement		Geography: Maryland									Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Home Improvement 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	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore	239	98.76	6.23	25.94	17.26	59.83	37.77	5.86	38.74	8.37	0.65	0.00	0.21	0.81	0.71
Limited Review:															
Hagerstown	3	1.24	1.49	0.00	13.28	33.33	51.66	33.33	33.57	33.33	1.21	0.00	0.00	1.12	1.96
Maryland Non-MSA	0	0.00	0.00	0.00	5.94	0.00	34.60	0.00	59.46	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: Home Mortgage Refinance		Geography: Maryland								Evaluation Period: January 1, 2012 to December 31, 2013					
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore	629	91.16	6.23	10.02	17.26	21.14	37.77	23.85	38.74	44.99	0.43	1.10	1.00	0.29	0.40
Limited Review:															
Hagerstown	32	4.64	1.49	0.00	13.28	28.13	51.66	43.75	33.57	28.13	0.46	0.00	0.59	0.45	0.45
Maryland Non-MSA	29	4.20	0.00	0.00	5.94	13.79	34.60	41.38	59.46	44.83	0.28	0.00	0.58	0.41	0.19

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: Multifamily		Geography: Maryland										Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Baltimore	7	87.50	15.02	0.00	28.55	42.86	35.00	28.57	21.43	28.57	0.83	0.00	2.86	0.00	0.00	
Limited Review:																
Hagerstown	0	0.00	14.35	0.00	35.61	0.00	30.34	0.00	19.70	0.00	0.00	0.00	0.00	0.00	0.00	
Maryland Non-MSA	1	12.50	0.00	0.00	22.53	100.00	44.24	0.00	33.23	0.00	25.00	0.00	100.00	0.00	0.00	

* Based on 2012 Peer Mortgage Data (USPR)

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: Small Loans to Businesses			Geography: Maryland								Evaluation Period: January 1, 2012 to December 31, 2013				
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
Full Review:															
Baltimore	8,432	87.41	7.54	8.37	14.38	14.66	36.66	38.15	41.18	38.82	14.11	19.87	16.86	14.53	10.97
Limited Review:															
Hagerstown	643	6.67	5.94	6.84	16.35	15.71	46.60	51.17	30.97	26.28	22.66	22.97	20.16	23.63	17.53
Maryland Non-MSA	572	5.93	0.00	0.00	10.67	10.14	39.77	39.86	49.56	50.00	21.46	0.00	23.16	18.84	20.13

* Based on 2012 Peer Small Business Data -- US and PR

** 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 (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: Small Loans to Farms		Geography: Maryland										Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Baltimore	12	75.00	2.09	0.00	7.55	41.67	40.15	33.33	50.21	25.00	1.65	0.00	16.67	1.15	0.77	
Limited Review:																
Hagerstown	3	18.75	0.51	0.00	5.64	0.00	61.54	100.00	32.31	0.00	4.92	0.00	0.00	6.38	0.00	
Maryland Non-MSA	1	6.25	0.00	0.00	6.64	0.00	46.68	100.00	46.68	0.00	1.96	0.00	0.00	4.17	0.00	

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase		Geography: Maryland						Evaluation Period: January 1, 2012 to December 31, 2013							
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore	109	85.83	22.06	13.76	17.40	31.19	20.57	20.18	39.97	34.86	0.20	0.26	0.29	0.12	0.19
Limited Review:															
Hagerstown	8	6.30	19.15	14.29	18.55	28.57	20.79	57.14	41.51	0.00	0.23	0.76	0.27	0.27	0.00
Maryland Non-MSA	10	7.87	14.77	10.00	15.03	20.00	20.03	30.00	50.16	40.00	0.28	1.30	0.28	0.44	0.10

* Based on 2012 Peer Mortgage Data (USPR)

** 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 Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement			Geography: Maryland								Evaluation Period: January 1, 2012 to December 31, 2013				
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore	239	98.76	22.06	32.64	17.40	40.17	20.57	17.99	39.97	9.21	0.68	0.84	0.53	0.97	0.53
Limited Review:															
Hagerstown	3	1.24	19.15	0.00	18.55	66.67	20.79	33.33	41.51	0.00	1.26	0.00	2.56	1.92	0.00
Maryland Non-MSA	0	0.00	14.77	0.00	15.03	0.00	20.03	0.00	50.16	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Maryland						Evaluation Period: January 1, 2012 to December 31, 2013							
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore	629	91.16	22.06	14.29	17.40	21.19	20.57	26.00	39.97	38.52	0.56	1.25	0.73	0.56	0.42
Limited Review:															
Hagerstown	32	4.64	19.15	9.68	18.55	41.94	20.79	22.58	41.51	25.81	0.56	0.00	1.35	0.61	0.35
Maryland Non-MSA	29	4.20	14.77	27.59	15.03	13.79	20.03	20.69	50.16	37.93	0.38	1.86	0.39	0.59	0.23

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses		Geography: Maryland			Evaluation Period: January 1, 2012 to December 31, 2013				
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	Rev\$ 1 Million or Less
Full Review:									
Baltimore	8,456	87.44	72.21	30.19	99.21	0.30	0.50	14.11	8.60
Limited Review:									
Hagerstown	643	6.65	68.34	22.40	99.84	0.16	0.00	22.66	11.48
Maryland Non-MSA	572	5.91	72.73	25.70	100.00	0.00	0.00	21.46	11.36

* Based on 2012 Peer Small Business Data -- US and PR

** 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 - 2013).

**** 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 66.20% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms		Geography: Maryland			Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Baltimore	12	75.00	95.65	41.67	100.00	0.00	0.00	1.65	7.46
Limited Review:									
Hagerstown	3	18.75	99.15	100.00	100.00	0.00	0.00	4.92	11.54
Maryland Non-MSA	1	6.25	97.85	100.00	100.00	0.00	0.00	1.96	9.09

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 12.50% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Maryland				Evaluation Period: January 1, 2011 to December 31, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Baltimore	6	27,688	52	89,613	58	117,301	97.89	0	0
Limited Review:									
Hagerstown	1	101	3	24	4	125	0.10	0	0
Maryland Non-MSA	0	0	3	2,399	3	2,399	2.00	0	0

* 'Prior Period Investments' means investments made in a previous 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: Maryland							
Evaluation Period: January 1, 2011 to December 31, 2013																	
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
Full Review:																	
Baltimore	90.75	26	86.67	3.85	15.38	30.77	50.00	4	1	0	3	0	0	11.56	21.17	34.33	32.38
Limited Review:																	
Hagerstown	4.33	2	6.67	0.00	50.00	50.00	0.00	0	0	0	0	0	0	3.63	17.72	46.35	28.12
Maryland Non-MSA	4.93	2	6.67	0.00	0.00	0.00	100.0	0	0	0	0	0	0	0.00	7.71	34.95	57.34

New Jersey

Table 1. Lending Volume

LENDING VOLUME		Geography: New Jersey						Evaluation Period: January 1, 2011 to December 31, 2013				
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)	
Full Review:												
Trenton	100.00	93	14,638	1,450	8,510	0	0	1	3,752	1,544	26,900	100.00

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2013.

*** Deposit Data as of June 30, 2013, excluding allocated Internet deposits. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: Home Purchase		Geography: New Jersey								Evaluation Period: January 1, 2012 to December 31, 2013					
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Trenton	30	100.00	6.87	6.67	14.10	20.00	36.68	36.67	42.35	36.67	0.41	0.00	0.72	0.48	0.30

* Based on 2012 Peer Mortgage Data (USPR)

** 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 units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: Home Improvement			Geography: New Jersey				Evaluation Period: January 1, 2012 to December 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Trenton	5	100.00	6.87	20.00	14.10	60.00	36.68	20.00	42.35	0.00	0.22	0.00	0.00	0.58	0.00	

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: Home Mortgage Refinance		Geography: New Jersey								Evaluation Period: January 1, 2012 to December 31, 2013					
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Trenton	38	100.00	6.87	7.89	14.10	26.32	36.68	42.11	42.35	23.68	0.16	1.10	0.53	0.28	0.03

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: Multifamily		Geography: New Jersey								Evaluation Period: January 1, 2012 to December 31, 2013					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Trenton	0	0.00	20.76	0.00	7.91	0.00	37.36	0.00	33.97	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: Small Loans to Businesses		Geography: New Jersey								Evaluation Period: January 1, 2012 to December 31, 2013					
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
Full Review:															
Trenton	1,071	100.00	11.77	13.45	10.89	13.82	28.32	31.75	49.03	40.99	10.59	18.47	16.01	10.96	7.22

* Based on 2012 Peer Small Business Data -- US and PR

** 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 (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: Small Loans to Farms												Geography: New Jersey					Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Trenton	0	0.00	4.05	0.00	12.31	0.00	29.34	0.00	54.30	0.00	0.00	0.00	0.00	0.00	0.00						

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase		Geography: New Jersey						Evaluation Period: January 1, 2012 to December 31, 2013							
Assessment Area:	Total Home Pruchase 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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Trenton	30	100.00	22.84	30.00	16.80	50.00	19.15	6.67	41.20	13.33	0.46	0.50	0.92	0.14	0.34

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement		Geography: New Jersey								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Trenton	5	100.00	22.84	40.00	16.80	40.00	19.15	20.00	41.20	0.00	0.24	0.00	0.00	0.85	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: New Jersey								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Trenton	38	100.00	22.84	23.68	16.80	34.21	19.15	7.89	41.20	34.21	0.19	0.57	0.46	0.09	0.12

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses		Geography: New Jersey			Evaluation Period: January , 2012 to December 31, 2013				
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	Rev\$ 1 Million or Less
Full Review:									
Trenton	1,071	100.00	70.75	26.05	99.63	0.37	0.00	10.59	5.82

* Based on 2012 Peer Small Business Data -- US and PR

** 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 - 2013).

**** 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 71.71% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms		Geography: New Jersey			Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Trenton	0	0.00	96.29	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: New Jersey				Evaluation Period: January 1, 2011 to December 31, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Trenton	1	999	19	8,494	20	9,493	100.00	0	0

* 'Prior Period Investments' means investments made in a previous 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: New Jersey			
Evaluation Period: January 1, 2011 to December 31, 2013																	
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
Full Review:																	
Trenton	100.00	1	100.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	13.57	16.01	31.90	38.00

Texas

Table 1. Lending Volume

LENDING VOLUME												
Geography: Texas												
Evaluation Period: January 1, 2011 to December 31, 2013												
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)	
Full Review:												
Houston	34.64	2,401	478,293	27,784	321,432	14	529	30	241,392	30,229	1,041,646	37.73
Limited Review:												
Austin	9.11	365	44,553	7,567	68,737	6	115	8	35,465	7,946	148,870	9.66
Beaumont	2.39	415	31,623	1,636	50,095	27	3,373	6	50,918	2,084	136,009	6.64
Brownsville	2.21	573	29,440	1,315	23,995	39	4,441	3	7,845	1,930	65,721	2.71
Corpus Christi	1.54	94	2,663	1,242	5,505	3	50	3	23,950	1,342	32,168	0.40
Dallas	22.74	1,127	240,220	18,692	212,380	14	950	13	134,306	19,846	587,856	19.20
Fort Worth	8.47	334	32,705	7,053	53,507	6	87	2	19,558	7,395	105,857	2.94
Longview	0.90	97	4,941	683	9,556	1	45	1	1,455	782	15,997	2.52
McAllen	2.76	420	23,912	1,980	15,119	6	602	0	0	2,406	39,633	1.69
San Antonio	8.05	253	69,012	6,757	44,166	5	35	10	54,378	7,025	167,591	2.32
Texarkana	0.81	197	21,012	508	16,814	2	35	1	50	708	37,911	2.16
Tyler	1.65	169	9,740	1,268	23,368	0	0	6	22,159	1,443	55,267	2.14
Victoria	0.63	65	3,812	486	2,430	1	12	0	0	552	6,254	1.14
Texas Non-MSA	4.10	690	57,459	2,850	52,837	21	315	14	17,332	3,575	127,943	8.73

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2013.

*** Deposit Data as of June 30, 2013, excludes allocated Internet deposits. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: Home Purchase		Geography: Texas								Evaluation Period: January 1, 2012 to December 31, 2013					
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Houston	379	36.58	4.56	6.86	21.69	26.12	29.10	22.43	44.65	44.59	0.21	0.93	0.54	0.18	0.17
Limited Review:															
Austin	82	7.92	5.09	15.85	16.44	23.17	36.16	28.05	42.32	32.93	0.12	0.69	0.23	0.10	0.07
Beaumont	50	4.83	2.86	4.00	22.85	14.00	40.53	44.00	33.77	38.00	1.07	6.45	1.61	1.05	0.88
Brownsville	74	7.14	0.98	0.00	23.63	22.97	47.56	43.24	27.84	33.78	1.29	0.00	2.52	0.88	1.32
Corpus Christi	6	0.58	8.26	0.00	19.96	33.33	35.18	50.00	36.59	16.67	0.02	0.00	0.33	0.00	0.00
Dallas	228	22.01	5.48	5.70	19.36	21.93	27.90	23.68	47.26	48.68	0.17	0.35	0.36	0.14	0.14
Fort Worth	52	5.02	4.10	7.69	20.68	36.54	37.70	30.77	37.52	25.00	0.10	0.00	0.40	0.09	0.05
Longview	8	0.77	1.76	0.00	20.42	50.00	44.32	0.00	33.51	50.00	0.35	0.00	0.87	0.00	0.54
McAllen	38	3.67	0.59	0.00	28.50	26.32	42.22	34.21	28.69	39.47	0.49	0.00	0.76	0.56	0.39
San Antonio	35	3.38	5.04	8.57	25.33	31.43	33.26	17.14	36.36	42.86	0.06	0.52	0.21	0.04	0.03
Texarkana	11	1.06	1.13	0.00	5.11	0.00	70.32	63.64	23.44	36.36	0.52	0.00	0.00	0.60	0.44
Tyler	7	0.68	1.20	14.29	21.75	14.29	42.20	57.14	34.85	14.29	0.15	5.00	0.26	0.23	0.00
Victoria	6	0.58	2.83	0.00	16.38	16.67	56.42	66.67	24.36	16.67	0.20	0.00	0.64	0.13	0.18
Texas Non-MSA	60	5.79	0.65	0.00	10.43	11.67	58.20	63.33	30.72	25.00	0.66	0.00	0.66	0.70	0.61

* Based on 2012 Peer Mortgage Data (USPR)

** 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 units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: Home Improvement			Geography: Texas						Evaluation Period: January 1, 2012 to December 31, 2013						
Assessment Area:	Total Home Improvement 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	Overall	Low	Mod	Mid	Upp
Full Review:															
Houston	524	28.70	4.56	9.35	21.69	55.73	29.10	12.98	44.65	21.95	3.11	4.63	5.94	3.81	2.26
Limited Review:															
Austin	43	2.35	5.09	6.98	16.44	44.19	36.16	32.56	42.32	16.28	1.36	0.00	3.33	2.34	0.57
Beaumont	115	6.30	2.86	2.61	22.85	46.09	40.53	27.83	33.77	23.48	9.70	10.00	21.05	7.85	8.25
Brownsville	180	9.86	0.98	0.56	23.63	41.11	47.56	36.67	27.84	21.67	30.08	0.00	26.92	36.11	24.00
Corpus Christi	62	3.40	8.26	24.19	19.96	67.74	35.18	4.84	36.59	3.23	1.04	0.00	0.00	0.90	1.68
Dallas	244	13.36	5.48	18.03	19.36	53.28	27.90	10.25	47.26	18.44	1.58	8.62	3.01	2.08	1.09
Fort Worth	85	4.65	4.10	10.59	20.68	72.94	37.70	7.06	37.52	9.41	0.70	0.00	1.38	0.60	0.64
Longview	40	2.19	1.76	7.50	20.42	67.50	44.32	10.00	33.51	15.00	4.62	0.00	6.67	1.28	7.25
McAllen	138	7.56	0.59	0.72	28.50	65.22	42.22	17.39	28.69	16.67	10.16	0.00	11.25	10.77	9.09
San Antonio	52	2.85	5.04	9.62	25.33	55.77	33.26	17.31	36.36	17.31	1.06	2.74	2.31	0.82	0.59
Texarkana	57	3.12	1.13	1.75	5.11	15.79	70.32	64.91	23.44	17.54	22.30	0.00	42.86	24.00	15.00
Tyler	80	4.38	1.20	3.75	21.75	55.00	42.20	27.50	34.85	13.75	7.77	33.33	3.03	9.52	6.61
Victoria	34	1.86	2.83	11.76	16.38	55.88	56.42	23.53	24.36	8.82	5.97	0.00	25.00	4.11	4.08
Texas Non-MSA	172	9.42	0.65	0.00	10.43	19.77	58.20	57.56	30.72	22.67	9.07	0.00	10.09	10.61	6.23

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: Home Mortgage Refinance		Geography: Texas						Evaluation Period: January 1, 2012 to December 31, 2013							
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Houston	954	38.64	4.56	5.45	21.69	36.37	29.10	22.43	44.65	35.74	0.54	1.81	1.92	0.63	0.35
Limited Review:															
Austin	145	5.87	5.09	10.34	16.44	17.93	36.16	42.76	42.32	28.97	0.21	0.89	0.49	0.27	0.11
Beaumont	116	4.70	2.86	4.31	22.85	25.00	40.53	33.62	33.77	37.07	2.28	5.88	5.24	1.92	2.06
Brownsville	140	5.67	0.98	0.71	23.63	33.57	47.56	36.43	27.84	29.29	3.27	14.29	5.00	3.24	2.95
Corpus Christi	13	0.53	8.26	7.69	19.96	61.54	35.18	15.38	36.59	15.38	0.16	0.00	1.39	0.16	0.04
Dallas	401	16.24	5.48	9.23	19.36	27.68	27.90	19.45	47.26	43.64	0.33	1.89	1.27	0.28	0.23
Fort	119	4.82	4.10	5.88	20.68	42.86	37.70	22.69	37.52	28.57	0.17	1.17	0.79	0.15	0.09
Longview	21	0.85	1.76	0.00	20.42	38.10	44.32	28.57	33.51	33.33	0.63	0.00	2.36	0.37	0.51
McAllen	148	5.99	0.59	0.00	28.50	33.78	42.22	40.54	28.69	25.68	1.98	0.00	2.51	3.36	1.17
San Antonio	86	3.48	5.04	8.14	25.33	40.70	33.26	20.93	36.36	30.23	0.15	2.03	0.57	0.15	0.07
Texarkana	64	2.59	1.13	1.56	5.11	6.25	70.32	57.81	23.44	34.38	3.83	0.00	12.50	4.59	2.71
Tyler	44	1.78	1.20	0.00	21.75	34.09	42.20	34.09	34.85	31.82	0.89	0.00	3.07	0.92	0.53
Victoria	8	0.32	2.83	0.00	16.38	37.50	56.42	50.00	24.36	12.50	0.23	0.00	0.00	0.43	0.00
Texas Non-MSA	210	8.51	0.65	0.48	10.43	13.81	58.20	62.38	30.72	23.33	2.85	3.70	6.13	3.30	1.67

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: Multifamily		Geography: Texas									Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Houston	20	51.28	23.66	15.00	30.65	30.00	21.92	35.00	23.77	20.00	1.78	1.72	3.45	1.92	0.00
Limited Review:															
Austin	1	2.56	23.27	0.00	26.97	0.00	28.83	100.00	20.93	0.00	0.00	0.00	0.00	0.00	0.00
Beaumont	0	0.00	9.18	0.00	28.45	0.00	31.39	0.00	30.98	0.00	0.00	0.00	0.00	0.00	0.00
Brownsville	1	2.56	2.73	0.00	20.10	100.00	35.34	0.00	41.83	0.00	5.26	0.00	20.00	0.00	0.00
Corpus Christi	0	0.00	12.30	0.00	9.40	0.00	39.48	0.00	38.82	0.00	0.00	0.00	0.00	0.00	0.00
Dallas	10	25.64	24.56	20.00	27.39	30.00	25.91	10.00	22.14	40.00	1.61	2.38	1.49	0.00	2.44
Fort Worth	0	0.00	8.52	0.00	37.26	0.00	42.91	0.00	11.31	0.00	0.00	0.00	0.00	0.00	0.00
Longview	0	0.00	1.34	0.00	26.74	0.00	49.23	0.00	22.68	0.00	0.00	0.00	0.00	0.00	0.00
McAllen	0	0.00	0.90	0.00	19.04	0.00	36.51	0.00	43.55	0.00	0.00	0.00	0.00	0.00	0.00
San Antonio	3	7.69	7.37	0.00	35.76	33.33	31.56	33.33	25.31	33.33	0.00	0.00	0.00	0.00	0.00
Texarkana	2	5.13	10.44	50.00	25.23	0.00	47.32	50.00	17.01	0.00	12.50	0.00	0.00	16.67	0.00
Tyler	0	0.00	8.79	0.00	24.01	0.00	37.46	0.00	29.74	0.00	0.00	0.00	0.00	0.00	0.00
Victoria	0	0.00	2.11	0.00	31.84	0.00	49.66	0.00	16.39	0.00	0.00	0.00	0.00	0.00	0.00
Texas Non-MSA	2	5.13	2.22	0.00	27.64	0.00	46.22	50.00	23.92	50.00	8.33	0.00	0.00	11.11	20.00

* Based on 2012 Peer Mortgage Data (USPR)

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: Small Loans to Businesses												Geography: Texas				Evaluation Period: January 1, 2012 to December 31, 2013				
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	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																				
Houston	21,232	34.87	8.67	10.58	20.32	22.36	24.71	27.59	46.24	39.48	13.96	17.47	16.40	14.72	10.02					
Limited Review:																				
Austin	5,732	9.41	6.74	7.64	16.34	18.96	29.28	32.96	47.56	40.44	12.13	14.12	14.56	12.52	8.73					
Beaumont	1,265	2.08	2.68	2.92	27.40	28.38	35.85	34.94	33.93	33.75	16.42	32.47	16.63	14.63	13.68					
Brownsville	995	1.63	4.06	5.23	28.36	29.75	36.83	42.01	30.48	23.02	18.60	21.18	16.81	18.58	11.39					
Corpus Christi	948	1.56	17.23	17.30	17.76	20.68	33.20	32.28	31.64	29.75	14.26	9.19	16.57	14.04	11.76					
Dallas	14,143	23.23	8.41	10.27	17.87	19.90	25.38	27.19	48.12	42.64	12.75	15.01	15.25	14.16	9.11					
Fort Worth	5,215	8.56	4.77	5.37	21.62	24.26	34.28	35.84	39.17	34.53	12.29	14.51	13.61	12.56	8.97					
Longview	535	0.88	0.81	1.68	33.98	33.08	38.20	39.07	26.85	26.17	15.42	19.05	13.86	12.46	11.08					
McAllen	1,535	2.52	0.19	0.46	23.33	23.19	36.21	36.61	40.20	39.74	15.79	20.00	13.71	12.92	11.21					
San Antonio	5,287	8.68	5.38	6.83	23.38	25.23	31.18	32.10	39.78	35.84	16.17	19.59	17.72	16.24	11.87					
Texarkana	412	0.68	6.11	9.95	8.48	12.38	54.84	50.49	30.58	27.18	23.72	32.29	31.87	22.77	14.09					
Tyler	976	1.60	7.18	7.07	19.53	23.16	36.42	33.40	36.72	36.37	15.56	12.29	18.06	13.93	12.69					
Victoria	386	0.63	2.42	5.18	19.59	25.13	54.03	51.55	23.85	18.13	15.33	25.71	20.26	11.95	10.15					
Texas Non-MSA	2,229	3.66	1.12	1.97	15.27	18.44	55.08	49.93	28.53	29.65	22.82	35.85	23.04	17.27	17.18					

* Based on 2012 Peer Small Business Data -- US and PR

** 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 (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: Small Loans to Farms												Geography: Texas					Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Houston	8	8.51	5.18	12.50	18.84	0.00	32.09	25.00	43.89	62.50	0.43	12.50	0.00	0.00	0.51						
Limited Review:																					
Austin	3	3.19	4.66	66.67	19.34	33.33	35.52	0.00	40.45	0.00	0.00	0.00	0.00	0.00	0.00						
Beaumont	21	22.34	2.65	0.00	17.88	9.52	38.41	14.29	41.06	76.19	15.12	0.00	25.00	3.70	20.00						
Brownsville	23	24.47	0.53	0.00	14.89	4.35	49.65	73.91	34.75	21.74	14.67	0.00	0.00	22.22	8.33						
Corpus Christ	1	1.06	10.71	0.00	14.11	0.00	37.15	0.00	37.91	100.00	0.00	0.00	0.00	0.00	0.00						
Dallas	10	10.64	5.96	0.00	17.25	0.00	31.04	10.00	45.65	90.00	1.20	0.00	0.00	0.00	2.10						
Fort Worth	3	3.19	4.07	0.00	20.18	33.33	38.08	0.00	37.64	66.67	2.27	0.00	5.88	0.00	2.08						
Longview	1	1.06	0.61	0.00	19.09	0.00	44.24	0.00	35.76	100.00	5.56	0.00	0.00	0.00	16.67						
McAllen	5	5.32	0.12	0.00	27.66	20.00	32.87	0.00	39.35	80.00	4.59	0.00	3.33	0.00	5.13						
San Antonio	2	2.13	3.78	0.00	18.85	0.00	37.61	50.00	39.71	50.00	1.56	0.00	0.00	1.82	2.22						
Texarkana	2	2.13	1.15	0.00	3.16	50.00	72.13	50.00	23.56	0.00	2.67	0.00	25.00	1.92	0.00						
Tyler	0	0.00	1.67	0.00	20.02	0.00	46.25	0.00	32.06	0.00	0.00	0.00	0.00	0.00	0.00						
Victoria	1	1.06	0.62	0.00	6.44	0.00	65.90	100.00	27.03	0.00	0.00	0.00	0.00	0.00	0.00						
Texas Non-MSA	14	14.89	0.46	0.00	5.91	0.00	57.66	78.57	35.97	21.43	0.85	0.00	0.00	0.46	0.88						

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase			Geography: Texas						Evaluation Period: January 1, 2012 to December 31, 2013						
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Houston	379	36.58	24.19	14.21	16.62	24.66	17.44	19.03	41.74	42.09	0.24	0.63	0.28	0.21	0.20
Limited Review:															
Austin	82	7.92	21.28	14.63	17.16	26.83	19.59	19.51	41.97	39.02	0.13	0.30	0.21	0.11	0.09
Beaumont	50	4.83	24.57	8.00	16.80	18.00	17.88	22.00	40.76	52.00	1.21	0.87	1.31	1.04	1.28
Brownsville	74	7.14	24.34	6.85	15.96	46.58	17.55	16.44	42.14	30.14	1.57	5.88	6.33	1.65	0.72
Corpus Christi	6	0.58	24.72	0.00	16.24	33.33	17.38	33.33	41.66	33.33	0.02	0.00	0.00	0.10	0.00
Dallas	228	22.01	23.50	18.94	16.57	27.31	17.88	17.18	42.05	36.56	0.19	0.64	0.27	0.10	0.13
Fort Worth	52	5.02	22.02	17.31	17.27	38.46	19.31	15.38	41.41	28.85	0.12	0.27	0.16	0.09	0.07
Longview	8	0.77	22.16	12.50	17.82	25.00	19.09	25.00	40.93	37.50	0.40	0.00	0.71	0.24	0.40
McAllen	38	3.67	25.27	2.63	15.52	21.05	16.77	13.16	42.44	63.16	0.57	0.00	1.19	0.45	0.55
San Antonio	35	3.38	23.37	15.15	17.23	45.45	19.25	18.18	40.15	21.21	0.06	0.18	0.18	0.04	0.01
Texarkana	11	1.06	22.31	10.00	16.02	10.00	19.16	20.00	42.51	60.00	0.58	2.33	0.59	0.36	0.54
Tyler	7	0.68	21.56	14.29	17.22	57.14	19.54	14.29	41.68	14.29	0.17	0.60	0.55	0.00	0.07
Victoria	6	0.58	23.27	0.00	16.02	16.67	19.54	50.00	41.16	33.33	0.22	0.00	0.44	0.30	0.13
Texas Non-MSA	60	5.79	20.77	10.53	17.52	22.81	19.08	24.56	42.63	42.11	0.67	2.10	1.35	0.52	0.49

* Based on 2012 Peer Mortgage Data (USPR)

** 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 Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.4% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement		Geography: Texas								Evaluation Period: January 1, 2012 to December 31, 2013					
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 ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Houston	524	28.70	24.19	16.06	16.62	31.55	17.44	26.77	41.74	25.62	3.20	7.42	6.65	5.63	1.88
Limited Review:															
Austin	43	2.35	21.28	23.26	17.16	34.88	19.59	25.58	41.97	16.28	1.40	7.46	3.31	1.62	0.53
Beaumont	115	6.30	24.57	21.74	16.80	24.35	17.88	26.96	40.76	26.96	9.87	27.27	14.55	8.82	7.14
Brownsville	180	9.86	24.34	8.33	15.96	16.11	17.55	23.89	42.14	51.67	32.27	22.22	22.22	40.91	32.14
Corpus Christi	62	3.40	24.72	20.97	16.24	40.32	17.38	20.97	41.66	17.74	1.09	0.00	3.23	2.63	0.54
Dallas	244	13.36	23.50	22.13	16.57	31.15	17.88	29.51	42.05	17.21	1.67	4.10	4.29	3.15	0.84
Fort Worth	85	4.65	22.02	22.35	17.27	32.94	19.31	21.18	41.41	23.53	0.73	1.22	0.42	1.04	0.65
Longview	40	2.19	22.16	20.00	17.82	35.00	19.09	20.00	40.93	25.00	4.86	5.56	0.00	8.11	4.90
McAllen	138	7.56	25.27	11.59	15.52	13.77	16.77	23.19	42.44	51.45	11.38	23.08	11.11	20.00	8.94
San Antonio	52	2.85	23.37	40.38	17.23	26.92	19.25	13.46	40.15	19.23	1.09	5.71	1.95	0.71	0.34
Texarkana	57	3.12	22.31	7.02	16.02	26.32	19.16	35.09	42.51	31.58	24.09	60.00	38.10	30.30	15.38
Tyler	80	4.38	21.56	20.00	17.22	27.50	19.54	23.75	41.68	28.75	8.30	6.25	18.18	10.34	5.70
Victoria	34	1.86	23.27	5.88	16.02	17.65	19.54	38.24	41.16	38.24	6.35	0.00	0.00	9.52	6.98
Texas Non-MSA	172	9.42	20.77	8.14	17.52	15.70	19.08	25.58	42.63	50.58	9.40	8.93	9.73	10.27	9.14

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.1% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Texas								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Houston	954	38.64	24.19	14.48	16.62	23.08	17.44	23.50	41.74	38.93	0.64	1.89	1.39	0.80	0.44
Limited Review:															
Austin	145	5.87	21.28	11.19	17.16	27.97	19.59	26.57	41.97	34.27	0.24	0.62	0.57	0.32	0.13
Beaumont	116	4.70	24.57	8.77	16.80	20.18	17.88	28.07	40.76	42.98	2.58	5.43	6.28	3.38	1.63
Brownsville	140	5.67	24.34	5.04	15.96	17.27	17.55	15.83	42.14	61.87	3.95	11.54	15.91	3.95	3.18
Corpus Christi	13	0.53	24.72	15.38	16.24	30.77	17.38	15.38	41.66	38.46	0.20	0.00	1.14	0.18	0.10
Dallas	401	16.24	23.50	15.70	16.57	20.51	17.88	23.80	42.05	40.00	0.39	1.75	0.79	0.47	0.24
Fort Worth	119	4.82	22.02	16.10	17.27	28.81	19.31	22.88	41.41	32.20	0.21	1.03	0.49	0.16	0.12
Longview	21	0.85	22.16	10.00	17.82	30.00	19.09	10.00	40.93	50.00	0.68	1.85	0.00	0.44	0.84
McAllen	148	5.99	25.27	2.03	15.52	9.46	16.77	13.51	42.44	75.00	2.40	3.33	2.25	3.65	2.25
San Antonio	86	3.48	23.37	9.41	17.23	24.71	19.25	24.71	40.15	41.18	0.21	0.61	0.43	0.25	0.14
Texarkana	64	2.59	22.31	1.59	16.02	17.46	19.16	14.29	42.51	66.67	4.58	6.67	10.39	3.01	4.23
Tyler	44	1.78	21.56	18.18	17.22	20.45	19.54	20.45	41.68	40.91	1.04	4.81	1.61	1.10	0.69
Victoria	8	0.32	23.27	12.50	16.02	12.50	19.54	25.00	41.16	50.00	0.28	0.00	0.00	0.00	0.39
Texas Non-MSA	210	8.51	20.77	5.24	17.52	16.67	19.08	23.81	42.63	54.29	3.29	6.41	6.65	4.50	2.55

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.6% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses		Geography: Texas			Evaluation Period: January 1, 2012 to December 31, 2013				
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	Rev\$ 1 Million or Less
Full Review:									
Houston	21,238	34.85	71.77	31.97	98.38	0.84	0.79	13.96	9.44
Limited Review:									
Austin	5,735	9.41	70.32	32.64	99.18	0.30	0.52	12.13	6.97
Beaumont	1,267	2.08	71.42	36.15	95.58	1.82	2.60	16.42	11.07
Brownsville	998	1.64	69.50	41.08	96.99	1.20	1.80	18.60	15.01
Corpus Christi	949	1.56	69.31	21.39	100.00	0.00	0.00	14.26	6.50
Dallas	14,157	23.23	71.22	32.27	98.59	0.56	0.85	12.75	7.95
Fort Worth	5,219	8.56	70.40	28.15	99.14	0.38	0.48	12.29	6.69
Longview	536	0.88	71.05	23.88	97.39	1.87	0.75	15.42	7.97
McAllen	1,537	2.52	70.32	31.55	99.28	0.26	0.46	15.79	9.74
San Antonio	5,307	8.71	70.80	22.82	99.42	0.26	0.32	16.17	7.30
Texarkana	412	0.68	72.61	37.38	93.69	3.16	3.16	23.72	18.85
Tyler	978	1.60	73.83	29.96	97.96	0.51	1.53	15.56	9.02
Victoria	387	0.63	70.64	24.29	100.00	0.00	0.00	15.33	8.45
Texas Non-MSA	2,229	3.66	73.38	29.74	96.68	1.66	1.66	22.82	13.27

* Based on 2012 Peer Small Business Data -- US and PR

** 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 - 2013).

**** 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 64.36% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms		Geography: Texas			Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [†]	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Houston	8	8.51	97.03	50.00	87.50	12.50	0.00	0.43	0.00
Limited Review:									
Austin	3	3.19	97.08	0.00	100.00	0.00	0.00	0.00	0.00
Beaumont	21	22.34	99.02	76.19	66.67	23.81	9.52	15.12	14.71
Brownsville	23	24.47	96.63	73.91	56.52	34.78	8.70	14.67	24.24
Corpus Christi	1	1.06	98.36	100.00	100.00	0.00	0.00	0.00	0.00
Dallas	10	10.64	96.86	50.00	70.00	20.00	10.00	1.20	1.71
Fort Worth	3	3.19	97.08	66.67	100.00	0.00	0.00	2.27	2.50
Longview	1	1.06	98.48	100.00	100.00	0.00	0.00	5.56	7.69
McAllen	5	5.32	94.68	40.00	60.00	40.00	0.00	4.59	7.50
San Antonio	2	2.13	97.60	50.00	100.00	0.00	0.00	1.56	1.28
Texarkana	2	2.13	97.41	100.00	100.00	0.00	0.00	2.67	3.64
Tyler	0	0.00	97.50	0.00	0.00	0.00	0.00	0.00	0.00
Victoria	1	1.06	99.58	100.00	100.00	0.00	0.00	0.00	0.00
Texas Non-MSA	14	14.89	97.91	64.29	100.00	0.00	0.00	0.85	0.81

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 18.09% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Texas				Evaluation Period: January 1, 2011 to December 31, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Houston	15	74,222	150	97,245	165	171,467	39.12	0	0
Limited Review:									
Austin	4	2,579	43	14,682	47	17,261	3.94	0	0
Beaumont	3	15,941	22	26,307	25	42,248	9.64	0	0
Brownsville	5	15,800	14	14,920	19	30,720	7.01	0	0
Corpus Christi	4	5,130	6	32,059	10	37,189	8.49	0	0
Dallas	4	8,997	143	29,405	147	38,402	8.76	0	0
Fort Worth	2	12,772	34	1,861	36	14,633	3.34	0	0
Longview	0	0	5	16	5	16	0.00	0	0
McAllen	1	2,449	15	10,595	16	13,044	2.98	0	0
San Antonio	2	9,228	53	47,922	55	57,150	13.04	0	0
Texarkana	0	0	7	7,960	7	7,960	1.82	0	0
Tyler	0	0	1	4	1	4	0.00	0	0
Victoria	0	0	1	4	1	4	0.00	0	0
Texas Non-MSA	2	1,144	8	7,024	10	8,168	1.86	0	0

* 'Prior Period Investments' means investments made in a previous 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: Texas			
Evaluation Period: January 1, 2011 to December 31, 2013																	
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
Full Review:																	
Houston	37.73	51	29.65	17.65	13.73	17.65	50.98	0	2	0	0	- 1	- 1	10.29	26.72	27.82	34.86
Limited Review:																	
Austin	9.66	15	8.72	13.33	13.33	40.00	33.33	1	0	0	0	0	1	12.38	21.49	33.03	32.94
Beaumont	6.64	10	5.81	0.00	40.00	10.00	50.00	0	1	0	- 1	0	0	5.65	26.09	35.59	30.19
Brownsville	2.71	6	3.49	16.67	16.67	33.33	33.33	0	3	- 1	0	- 2	0	1.86	28.20	47.90	22.03
Corpus Christi	0.40	2	1.16	0.00	0.00	50.00	50.00	0	0	0	0	0	0	12.10	22.69	34.15	30.69
Dallas	19.20	32	18.60	9.38	12.50	18.75	59.38	1	1	1	0	0	- 1	11.95	25.11	26.51	36.43
Fort Worth	2.94	10	5.81	0.00	20.00	30.00	50.00	1	0	0	0	1	0	7.23	26.55	35.83	30.39
Longview	2.52	4	2.33	0.00	0.00	75.00	25.00	0	0	0	0	0	0	2.48	29.74	39.74	28.03
McAllen	1.69	5	2.91	0.00	40.00	20.00	40.00	0	1	0	0	0	- 1	0.68	32.44	41.25	25.24
San Antonio	2.32	7	4.07	0.00	0.00	57.14	42.86	1	1	0	0	0	0	7.43	30.61	31.47	30.49
Texarkana	2.16	6	3.49	33.33	0.00	50.00	16.67	0	1	0	0	- 1	0	3.12	7.36	68.12	21.40
Tyler	2.14	4	2.33	25.00	0.00	25.00	50.00	0	1	0	0	- 1	0	3.33	26.76	39.09	30.82
Victoria	1.14	2	1.16	0.00	0.00	50.00	50.00	0	0	0	0	0	0	4.04	22.26	54.27	19.43
Texas Non-MSA	8.73	18	10.47	0.00	22.22	50.00	27.78	0	0	0	0	0	0	1.14	14.02	55.89	28.95

Virginia

Table 1. Lending Volume

LENDING VOLUME		Geography: Virginia						Evaluation Period: January 1, 2011 to December 31, 2013				
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)	
Full Review:												
Charlottesville	66.67	46	21,758	558	3,214	1	20	1	7,250	606	32,242	47.08
Limited Review:												
Virginia Non-MSA	33.33	18	2,672	285	1,322	0	0	0	0	303	3,994	52.92

* Loan Data as of December 31, 2013. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2013.

*** Deposit Data as of June 30, 2013, excluding allocated Internet deposits. Rated Area refers to either the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: Home Purchase		Geography: Virginia									Evaluation Period: January 1, 2012 to December 31, 2013				
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	Overall	Low	Mod	Mid	Upp
Full Review:															
Charlottesville	10	90.91	0.89	10.00	14.46	20.00	41.24	20.00	43.41	50.00	0.14	0.00	0.35	0.00	0.24
Limited Review:															
Virginia Non-MSA	1	9.09	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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 units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: Home Improvement		Geography: Virginia								Evaluation Period: January 1, 2012 to December 31, 2013					
Assessment Area:	Total Home Improvement 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	Overall	Low	Mod	Mid	Upp
Full Review:															
Charlottesville	0	0.00	0.89	0.00	14.46	0.00	41.24	0.00	43.41	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Virginia Non-MSA	1	100.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	1.22	0.00	0.00	0.00	1.22

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: Home Mortgage Refinance			Geography: Virginia				Evaluation Period: January 1, 2012 to December 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Charlottesville	20	62.50	0.89	0.00	14.46	30.00	41.24	55.00	43.41	15.00	0.22	0.00	0.79	0.25	0.05	
Limited Review:																
Virginia Non-MSA	12	37.50	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	0.39	0.00	0.00	0.00	0.39	

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Owner-Occupied Units is the number of owner-occupied units in a particular geography divided by the number of owner-occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: Multifamily		Geography: Virginia										Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Charlottesville	1	100.00	13.81	0.00	33.18	0.00	28.36	100.00	24.65	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Virginia Non-MSA	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2012 Peer Mortgage Data (USPR)

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: Small Loans to Businesses												Geography: Virginia				Evaluation Period: January 1, 2012 to December 31, 2013				
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	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																				
Charlottesville	456	65.33	2.76	5.70	14.47	16.23	34.69	33.99	47.27	44.08	13.40	25.76	13.95	11.76	10.98					
Limited Review:																				
Virginia Non-MSA	242	34.67	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	23.75	0.00	0.00	0.00	21.18					

* Based on 2012 Peer Small Business Data -- US and PR

** 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 (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: Small Loans to Farms		Geography: Virginia										Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Charlottesville	1	100.00	0.48	0.00	13.28	0.00	33.92	100.00	52.32	0.00	3.03	0.00	0.00	14.29	0.00	
Limited Review:																
Virginia Non-MSA	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: Home Purchase		Geography: Virginia								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Charlottesville	10	90.91	19.97	10.00	15.98	50.00	19.75	10.00	44.30	30.00	0.16	0.00	0.24	0.00	0.22
Limited Review:															
Virginia Non-MSA	1	9.09	9.80	0.00	11.56	0.00	16.80	0.00	61.85	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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 Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: Home Improvement		Geography: Virginia								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Charlottesville	0	0.00	19.97	0.00	15.98	0.00	19.75	0.00	44.30	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Virginia Non-MSA	1	100.00	9.80	0.00	11.56	0.00	16.80	100.00	61.85	0.00	1.32	0.00	0.00	4.55	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: Home Mortgage Refinance		Geography: Virginia								Evaluation Period: January 1, 2012 to December 31, 2013					
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
Charlottesville	20	62.50	19.97	15.00	15.98	40.00	19.75	5.00	44.30	40.00	0.25	0.78	0.61	0.11	0.14
Limited Review:															
Virginia Non-MSA	12	37.50	9.80	8.33	11.56	0.00	16.80	25.00	61.85	66.67	0.51	3.45	0.00	0.47	0.47

* Based on 2012 Peer Mortgage Data (USPR)

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: Small Loans to Businesses		Geography: Virginia			Evaluation Period: January 1, 2012 to December 31, 2013				
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	Rev\$ 1 Million or Less
Full Review:									
Charlottesville	457	65.38	69.75	27.57	100.00	0.00	0.00	13.40	6.94
Limited Review:									
Virginia Non-MSA	242	34.62	73.51	36.78	100.00	0.00	0.00	23.75	17.92

* Based on 2012 Peer Small Business Data -- US and PR

** 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 - 2013).

**** 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 66.81% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: Small Loans to Farms		Geography: Virginia			Evaluation Period: January 1, 2012 to December 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Charlottesville	1	100.00	98.08	0.00	100.00	0.00	0.00	3.03	0.00
Limited Review:									
Virginia Non-MSA	0	0.00	98.47	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 100.0% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Virginia				Evaluation Period: January 1, 2011 to December 31, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Charlottesville	8	7,922	10	8,478	18	16,400	100.00	0	0
Limited Review:									
Virginia Non-MSA	0	0	0	0	0	0	0.00	0	0

* 'Prior Period Investments' means investments made in a previous 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: Virginia			
Evaluation Period: January 1, 2011 TO December 31, 2013																	
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
Full Review:																	
Charlottesville	47.08	1	50.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	7.00	17.73	39.69	33.75
Limited Review:																	
Virginia Non-MSA	52.92	1	50.00	0.00	0.00	0.00	100.0	0	0	0	0	0	0	0.00	0.00	0.00	100.00