

# **PUBLIC DISCLOSURE**

April 27, 2015

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Banco Popular de Puerto Rico  
RSSD No. 940311

209 Munoz Rivera Avenue  
San Juan, Puerto Rico 00918

FEDERAL RESERVE BANK OF NEW YORK  
33 LIBERTY STREET  
NEW YORK, NY 10045

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, nor should it 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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## INSTITUTION’S CRA RATING

**INSTITUTION’S CRA RATING:** Banco Popular de Puerto Rico (“Banco Popular” or “BPPR”) is rated **“OUTSTANDING.”**

*The following table indicates the performance level of Banco Popular with respect to the lending, investment and service tests.*

<b>PERFORMANCE LEVELS</b>	<b>BANCO POPULAR de PUERTO RICO</b>		
	<b>PERFORMANCE TESTS</b>		
	<b>Lending Test*</b>	<b>Investment Test</b>	<b>Service Test</b>
Outstanding	<b>X</b>		<b>X</b>
High Satisfactory		<b>X</b>	
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

The major factors supporting the institution’s rating follow:

- The overall number of home purchase, refinance, home improvement and small business loans originated or purchased by the bank and its affiliates during the evaluation period shows excellent responsiveness to credit needs of the bank’s assessment areas.
- The overall geographic distribution of lending was good.
- The overall distribution of loans among borrowers of different income levels and businesses of different sizes was good.
- BPPR is a leader in providing community development loans.

- The level of qualified investments and grants was significant.
- Retail delivery systems were readily accessible to the bank’s geographies and individuals of different income levels and businesses of different sizes within the assessment areas.
- BPPR is a leader in providing community development services.

## INSTITUTION

### DESCRIPTION OF INSTITUTION\*

<b>Total assets</b>	<b>\$28.5 billion</b>
<b>Net loans &amp; leases</b>	<b>\$18.4 billion</b>
<b>Total domestic deposits</b>	<b>\$22.3 billion</b>
<b>Number of branches</b>	<b>175</b>
<b>Headquarters</b>	<b>San Juan, PR</b>
<b>Bank holding company</b>	<b>Popular Inc.</b>

\*Data as of March 31, 2015

Banco Popular is a full-service commercial bank headquartered in San Juan, Puerto Rico. Banco Popular is primarily engaged in retail and commercial banking services, including automobile and equipment leasing and financing, investment banking, broker-dealer and insurance services through specialized subsidiaries. All products and services are offered through Banco Popular’s 175 branch network and alternative delivery channels, such as by telephone, internet or through automated teller machines (“ATMs”). BPPR is a publicly traded, wholly-owned subsidiary of Popular Inc., a multi-regional diversified financial holding company with \$36 billion in combined total assets as of March 31, 2015.

BPPR is the leading financial institution in the Commonwealth of Puerto Rico (“Puerto Rico”), ranking first in deposit market share, small business lending, home purchase, refinance, and home improvement lending, and a leader in community development lending over the evaluation period. BPPR operates 167 retail branches in its Puerto Rico assessment area and eight branches in the United States Virgin Islands (“USVI”) assessment area for a total of 175 branches.

Banco Popular’s assessment areas include all of Puerto Rico and the USVI. Within Puerto Rico the assessment areas include 7 Metropolitan Statistical Areas (“MSAs”) assessment areas and three non-metropolitan assessment areas (“Non-MSA”). In the USVI the assessment area consists of one Non-MSA assessment area. The assessment areas are as follows.

### **Commonwealth of Puerto Rico**

- MSA 41980 (San Juan-Caguas-Guaynabo, PR)
- MSA 10380 (Aguadilla-Isabela-San Sebastian, PR)
- MSA 38660 (Ponce, PR)
- MSA 32420 (Mayaguez, PR)
- MSA 41900 (San German-Cabo Rojo, PR)
- MSA 25020 (Guayama, PR)
- MSA 11640 (Arecibo, PR) New - 2014
- Non-MSA Group A (Municipios of Adjuntas, Jayuya, Las Marias, and Maricao)
- Non-MSA Group B (Municipios of Coamo, Santa Isabel, and Salinas)
- Non-MSA Group C (Municipios of Vieques and Culebra)

### **United States Virgin Islands**

- Non-MSA United States Virgin Island: (Islands of St. Thomas, St. Croix and St. John)

#### **2014 MSA changes**

In February of 2013 the Office of Management and Budget issued OMB Bulletin 13-01 “Revised Delineation of Metropolitan Statistical Areas”, Micropolitan Statistical Areas, and Guidance on uses of the delineation of these areas. The changes indicated in Bulletin 13-01 were implemented by the bank in the reporting of Home Mortgage Disclosure Act (“HMDA”) and Community Reinvestment Act (“CRA”) data for 2014. Major changes included the following:

- MSA 10380 (Aguadilla-Isabela, San Sebastian, PR). Added the municipio of Utado.
- MSA 11640 (Arecibo, PR). Created new MSA consisting of the municipios of Arecibo, Camuy, Hatillo, and Quebradillas.
- MSA 38660 (Ponce, PR). Added municipios of Guanica, Guayanilla, Penuelas, and Yauco.
- MSA 41980 (San Juan-Caguas-Guaynabo, PR). Added municipios of Ceiba, Fajardo, and Luquillo. Transferred municipios of Arecibo, Camuy, Hatillo, and Quebradillas to a new MSA 11640.
- MSA 21940 (Fajardo, PR). Consolidated into MSA 41980.
- MSA 49500 (Yauco, PR). Consolidated into MSA 38660.
- Non-MSA Group A. Transferred municipio of Utuado to MSA 10380.

Banco Popular’s assessment areas are in compliance with the requirements of Section 228.41 of Regulation BB and do not arbitrarily exclude any low- or moderate-income (“LMI”) geographies. There are no financial or legal factors that would prevent the bank from fulfilling its responsibilities under CRA.

## **Previous Performance Evaluation**

Banco Popular received an Outstanding rating as a result of the January 22, 2013 performance evaluation conducted by the Federal Reserve Bank of New York. The lending test was rated Outstanding, the investment test was rated High Satisfactory and the service test was rated Outstanding.

## **SCOPE OF EXAMINATION**

### **Procedures**

BPPR's CRA performance was evaluated using the Federal Financial Institutions Examination Council's Interagency CRA Procedures for Large Retail Institutions.

### **Products**

Banco Popular's home purchase, refinance, home improvement, small business and other loans qualifying as community development loans were evaluated. The mortgage loans were reported under HMDA and small business loans were reported under CRA. HMDA-related loans were reported for Puerto Rico only, as reporting requirements under HMDA are not applicable with respect to dwellings in U.S. territories, such as the USVI. Bank management supplied data for mortgage loans BPPR originated in the USVI. Examiners verified the integrity of HMDA and small business loan data.

BPPR also originates small farm and multifamily loans; however, these products were excluded from the analysis because they represented a low percentage of the overall number of loans originated or purchased. Multifamily loans qualifying as community development loans were considered in the evaluation of community development lending.

### **Affiliates**

BPPR collects and reports information on various consumer-related affiliates. HMDA-related and small business activities of the following affiliates were considered during the evaluation:

- Popular Mortgage Inc., a mortgage origination and secondary marketing subsidiary; and,
- Popular Auto Inc., an automobile and indirect financing subsidiary.

### **Examination Period**

HMDA-related and CRA small business loans originated or purchased between January 1, 2012, and December 31, 2014, were evaluated. Examiners also evaluated community development services, community development loans and qualified investments made between January 1, 2012 and March 31, 2015.

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### **Lending Distribution Analysis**

In evaluating the geographic distribution of HMDA-related loans, examiners analyzed the proportion of loan originations in LMI and non-LMI geographies compared with the proportion of owner-occupied housing units in those geographies. For small business loans, the analysis compared the proportion of loan originations in LMI and non-LMI geographies with the proportion of businesses in those geographies.

In order to analyze the borrower characteristics of HMDA-related loans, the proportion of originations to LMI borrowers was compared with the proportion of LMI families in the assessment areas. Income estimates from the U.S. Department of Housing and Urban Development (“HUD”) were used to categorize borrower income. HUD-adjusted median family income figures for 2012 were used to categorize borrower income level for 2012 loans, HUD-adjusted median family income figures for 2013 were used to categorize 2013 loans, and HUD-adjusted median family income figures for 2014 were used to categorize borrower income level for 2014 loans. Dunn and Bradstreet (“D&B”) data for 2012, 2013, and 2014 were used for demographic information relating to the proportion of businesses with gross annual revenues (“GAR”) of less than or equal to \$1 million. The size of the small business loan was also used as a proxy to identify lending to smaller businesses.

BPPR’s 2012, 2013 and 2014 HMDA-related and small business loan originations were also compared to the 2012, 2013 and 2014 market aggregate of all institutions reporting such loans in each full-review assessment area, except the USVI.

Only loans inside the assessment areas were included in the analysis of geographic and borrower distribution. Before reaching a conclusion about the bank’s overall performance regarding geographic distribution and borrower characteristics in each assessment area, examiners gave greater weight to certain loan products. In each assessment area, a product’s volume compared with total retail lending volume determined the weight of a product’s performance in the overall conclusion.

### **Community Development Activity Analysis**

Community development activities were reviewed to determine that the activity qualified as community development and that those activities benefited the bank’s assessment areas. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to better understand the volume of activity impacting a particular assessment area, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted using annualized metrics to gauge the relative performance of the institution in a particular assessment area.

### **Deriving Overall Conclusions**

Overall conclusions regarding the bank's CRA performance were based primarily on performance in Puerto Rico, which represents 95% of the bank's branches, 96% of the total deposits, and 99% of all lending activity, as of June 30, 2014. Therefore, performance in the USVI was not significantly weighted in the overall CRA rating. To reach a conclusion about the bank's overall lending performance in each assessment area, products were weighted based on their volume in that area. For additional details, see Exhibit I, Summary of Key Assessment Area Data and Exhibit 4, Summary of Key Assessment Area Data Puerto Rico, which contains a summary of assessment area data for all rated areas.

Within Puerto Rico, examiners conducted a full scope review of BPPR's performance in MSA 41980 (San Juan-Caguas-Guaynabo, PR), MSA 10380 (Aguadilla-Isabela-San Sebastian, PR), and MSA 38660 (Ponce, PR). Limited scope reviews were performed on the remaining MSAs and Non-MSA assessment areas in Puerto Rico. The full scope review areas within Puerto Rico collectively represent 84% of the lending activity, 91% of the deposits, and 81% of the branches in Puerto Rico. Overall conclusions about performance in Puerto Rico were primarily influenced by the bank's performance in MSA 41980 (San Juan-Caguas-Guaynabo, PR), which represents 73% of total lending, 83% of deposits, and 66% of branches in the combined Puerto Rico assessment areas.

In addition, a full-scope review was conducted of the USVI, consisting of the islands of St. Thomas, St. Croix, and St. John.

Exhibit 1 on page 10 highlights additional key assessment area data for the combined Puerto Rico and the USVI assessment areas over the evaluation period.

**EXHIBIT 1: Summary of Key Assessment Area Data ALL ASSESSMENT AREAS**

	PUERTO RICO	USVI	TOTAL
<b>Total Population<sup>1</sup></b>	<b>3,825,789</b>	<b>106,405</b>	<b>3,932,194</b>
<b>Population % of AA population</b>	<b>97%</b>	<b>3%</b>	<b>100%</b>
<b>Families</b>	<b>885,576</b>	<b>26,237</b>	<b>911,813</b>
<b>Families % of AA families</b>	<b>97%</b>	<b>3%</b>	<b>100%</b>
<b>Total Census Tracts<sup>1</sup></b>	<b>945</b>	<b>32</b>	<b>977</b>
<b>Tracts % AA tracts</b>	<b>97%</b>	<b>3%</b>	<b>100%</b>
<b>LMI tracts</b>	<b>270</b>	<b>8</b>	<b>278</b>
<b>LMI tracts % all AA LMI tracts</b>	<b>97%</b>	<b>3%</b>	
<b>Total Owner-Occupied Units<sup>1</sup></b>	<b>888,755</b>	<b>20,700</b>	<b>909,455</b>
<b>Units % of AA units</b>	<b>98%</b>	<b>2%</b>	<b>100%</b>
<b>Business Establishments<sup>2</sup></b>	<b>16,943</b>	<b>1,961</b>	<b>18,904</b>
<b>Bus. est. % AA bus. est.</b>	<b>90%</b>	<b>10%</b>	<b>100%</b>
<b>Number of Branches<sup>3</sup></b>	<b>167</b>	<b>8</b>	<b>175</b>
<b>Branches % all branches</b>	<b>95%</b>	<b>5%</b>	<b>100%</b>
<b>Branches in LMI tracts</b>	<b>46</b>	<b>4</b>	<b>50</b>
<b>LMI branches % AA LMI branches</b>	<b>92%</b>	<b>8%</b>	<b>100%</b>
<b>Branch Deposits (\$'000s)<sup>4</sup></b>	<b>19,954,076</b>	<b>761,447</b>	<b>20,715,523</b>
<b>Deposits % AA deposits</b>	<b>96%</b>	<b>4%</b>	<b>100%</b>
<b>Deposit Market Share (%) / Rank in Market<sup>4</sup></b>	<b>96% /1</b>	<b>44%/2</b>	
<b>Home Purchase Originations<sup>5</sup></b>	<b>16,438</b>	<b>67</b>	<b>16,505</b>
<b>HP originations % AA orig.</b>	<b>100%</b>	<b>0%</b>	<b>100%</b>
<b>Refinance Originations<sup>5</sup></b>	<b>14,540</b>	<b>155</b>	<b>14,695</b>
<b>Refi orig. % AA orig.</b>	<b>99%</b>	<b>1%</b>	<b>100%</b>
<b>Home Improvement Originations<sup>5</sup></b>	<b>12,689</b>	<b>215</b>	<b>12,904</b>
<b>Home Improvement orig. % AA orig.</b>	<b>98%</b>	<b>2%</b>	<b>100%</b>
<b>Small Business Originations<sup>5</sup></b>	<b>21,570</b>	<b>342</b>	<b>21,912</b>
<b>SB orig. % AA orig.</b>	<b>98%</b>	<b>2%</b>	<b>100%</b>
<b>Combined Loan Totals<sup>5</sup></b>	<b>65,237</b>	<b>779</b>	<b>66,016</b>
<b>% of AA Orig.</b>	<b>99%</b>	<b>1%</b>	<b>100%</b>

1) Source: 2010 Census Data as of 12/31/2013; 2) Source 2013 Puerto Rico 2014 VI D&B information.

3) Branches as of 12/31/2014; 4) Source FDIC Summary of Deposits as of 6/30/2014

5) Originations include Originations and loans purchased between Jan. 1, 2012 and December 31, 2013 VI includes January 1, 2012 - December 31, 2014.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

Banco Popular's overall performance under the lending test is rated outstanding based on excellent performance in Puerto Rico and good performance in the USVI. The major factors contributing to this overall rating is excellent responsiveness to the retail credit needs of the community, an excellent level of community development loans and good geographic and borrower distribution for HMDA and small business loans.

#### Lending Activity

BPPR's responsiveness to the retail credit needs of its assessment areas was excellent, given the bank's capacity to meet assessment area credit needs and overall market conditions including the state of the housing market and overall weaker economic conditions. This was determined by evaluating the volume of HMDA-related and small business loans originated or purchased during the evaluation period. This conclusion is based on excellent performance in Puerto Rico and good lending in the USVI. Lending activity is primarily in Puerto Rico which has 99% of all HMDA and small business activity.

Overall, 90,267 home purchase, refinance, home improvement, and small business loans were made during the evaluation period, totaling \$8.4 billion as indicated in the table below. This represents a decline of 8% in the number of loans and a decline of 12% in the amount of loans on an annualized basis compared to the previous evaluation.

<b>SUMMARY OF LENDING ACTIVITY</b> <b>January 1, 2012 – December 31, 2014</b>				
<b>LOAN TYPE</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
HMDA HOME PURCHASE	21,364	24	\$2,964,324	7
HMDA REFINANCINGS	18,599	21	\$2,494,647	17
HMDA HOME IMPROVEMENT	18,433	20	\$450,567	5
<b>TOTAL HMDA-RELATED</b>	<b>58,396</b>	<b>65</b>	<b>\$5,909,538</b>	<b>71</b>
<b>TOTAL SMALL BUSINESS</b>	<b>31,871</b>	<b>35</b>	<b>\$2,457,916</b>	<b>29</b>
<b>TOTAL LOANS</b>	<b>90,267</b>	<b>100</b>	<b>\$8,367,454</b>	<b>100</b>

Note: This table includes bank and affiliate loans made within the evaluation period.

### Assessment Area Concentration

BPPR's responsiveness to the retail credit needs of its assessment areas was excellent. A substantial majority of the loans originated by BPPR were extended in the Bank's assessment areas as detailed in the chart below. The chart indicates excellent distribution of HMDA and small business loans. BPPR extended all but a fraction of a percent of its loans to individuals and business within its assessment area demonstrating excellent performance in meeting the credit needs of Puerto Rico and the USVI.

<b>LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREA JANUARY 1, 2012 – DECEMBER 31, 2014</b>								
LOAN TYPE	INSIDE				OUTSIDE			
	#	%	\$ (000S)	%	#	%	\$ (000S)	%
HMDA HOME PURCHASE	21,342	99.9	\$2,959,290	99.8	22	.1	\$5,034	.2
HMDA REFINANCINGS	18,548	99.7	\$2,482,699	99.5	51	.3	\$11,948	.5
HMDA HOME IMPROVEMENT	18,422	99.9	\$449,685	99.8	11	.1	\$882	.2
<b>TOTAL HMDA-RELATED</b>	<b>58,312</b>	<b>99.9</b>	<b>\$5,891,674</b>	<b>99.7</b>	<b>84</b>	<b>.1</b>	<b>\$17,864</b>	<b>.3</b>
<b>TOTAL SMALL BUSINESS</b>	<b>31,871</b>	<b>100</b>	<b>\$2,457,916</b>	<b>100</b>	<b>0</b>	<b>0</b>	<b>\$0</b>	<b>0</b>
<b>TOTAL LOANS</b>	<b>90,183</b>	<b>99.9</b>	<b>\$8,349,590</b>	<b>99.8</b>	<b>84</b>	<b>.1</b>	<b>\$17,864</b>	<b>.2</b>

Note: This table includes only loans originated or purchased by the bank. Affiliate loans are not included.

### Geographic Distribution

BPPR exhibited good overall loan penetration in LMI geographies, based on good performance in Puerto Rico and adequate performance in the USVI. The analysis considered performance context factors, such as the number of owner-occupied units in LMI geographies and the market aggregate's performance. Demand for residential mortgage products typically is tied to the availability of owner-occupied housing units. For HMDA-related loans, conclusions were based primarily on performance in moderate-income geographies, as the very low number of owner-occupied housing units in low-income tracts makes it difficult to extend HMDA-related loans in those geographies.

### Distribution by Borrower Income and Revenue Size of Business

The distribution of loans among borrowers of different income levels and businesses of different sizes was good overall based on good performance in Puerto Rico and good performance in the USVI given the wide disparity between housing prices and incomes, which generally places

owner-occupied housing beyond the reach of LMI families. This disparity also makes the available market for refinancings to LMI families very limited. Performance relative to moderate-income borrowers was given the most weight because the income level of low-income borrowers precludes them from most housing-related loans. This rating also considers the excellent penetration among businesses of different sizes.

### **Innovative or Flexible Lending Practices**

BPPR's makes use of innovative and/or flexible lending practices in serving assessment area credit needs. A number of BPPR's products were responsive to specific community needs in the bank's assessment areas, as illustrated below:

- Pronto Popular is a savings account created to implement the Federal Home Loan Bank's ("FHLB") First Home Club ("FHC") Program. FHLB's program helps LMI individuals acquire their first home by matching funds saved by the participants. The program is aimed at households with incomes at or below 80% of the median area income. The FHC provides down payment and closing cost assistance by granting four dollars in matching funds for each dollar saved in a dedicated account (up to \$7,500 in matching funds). During the evaluation period, 24 loans totaling \$2.6 million were made to individuals and families under this program.
- Federal Housing Administration ("FHA") and Veterans Administration ("VA") guaranteed mortgage loans offered by Popular Mortgage, which allow for full financing of the property's appraised value. During the evaluation period of January 1, 2012 through December 31, 2014, BPPR originated 5,331 FHA loans totaling \$614 million. Under the VA program, BPPR originated 673 loans totaling \$119 million.
- The Enhanced Portfolio Program, offered by Popular Mortgage, is designed for borrowers with adverse credit histories and limited incomes. The program acts as an alternative for people who do not qualify under FHA or Federal National Mortgage Association ("FNMA") requirements. During the evaluation period, BPPR originated 12 Enhanced Portfolio Program loans for \$1.1 million.
- Puerto Rico Law 87 - The purpose of this program is to provide mortgage insurance for the purchase of a home for low- and moderate-income families, qualified through FHA Mortgage Insurance guidelines through the Puerto Rico Housing Finance Agency ("PRHFA"). The program was established by the Puerto Rican government under Law 87. During the evaluation period, Banco Popular originated 45 loans with mortgage insurance under this program totaling \$6.3 million.

### **Community Development Lending**

Banco Popular is a leader in community development lending and highly responsive to the credit needs within its assessment areas based on excellent performance in both Puerto Rico and in the

USVI. As shown in Exhibit 2, the bank extended 815 community development loans totaling approximately \$1.7 billion. Moreover, new commitments represented \$1.4 billion of total community lending loans, or 79% of the dollar amount of total activity. Exhibit 2 below provides a summary of the types and distribution of community development loan activity during the evaluation period.

<b>EXHIBIT 2: Community Development Loans</b>										
Assessment Area	Affordable Housing		Economic Development		Community Services		Revitalize and Stabilize		Combined Totals	
	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)
<b>Puerto Rico</b>										
MSA 41980 (San Juan-Caguas-Guaynabo, PR) - FULL SCOPE	23	82,350	68	243,474	428	501,893	17	382,672	536	1,210,389
MSA 10380 (Aguadilla-Isabela-San Sebastian, PR) - FULL SCOPE	0	0	7	9,259	50	32,135	2	9,809	59	51,203
MSA 38660 (Ponce, PR) - FULL SCOPE	6	22,697	2	1,215	64	101,656	5	75,640	77	201,208
MSA 11640 (Arecibo, PR)	0	0	2	1,119	3	1,137	0	0	5	2,256
MSA 21940 (Fajardo, PR)	0	0	0	0	2	1,256	0	0	2	1,256
MSA 25020 (Guayama, PR)	0	0	4	70	7	167	0	0	11	237
MSA 32420 (Mayaguez, PR)	3	12,048	7	28,533	27	13,245	2	13,000	39	66,826
MSA 41900 (San German-Cabo Rojo, PR)	1	4,947	0	0	12	39,506	0	0	13	44,453
MSA 49500 (Yauco, PR)	1	330	2	9,910	5	6,935	0	0	8	17,175
Non-MSA A (Municipalities of Adjuntas, Jayuya, Utuado, Las Marias, Maricao)	0	0	2	20	10	330	1	25	13	375
Non-MSA B (Municipalities of Coamo, Santa Isabel, Salinas)	2	6,800	5	3,000	5	2,578	0	0	12	12,378
Non-MSA C (Municipalities of Vieques and Culebra)	0	0	1	1,377	3	110	0	0	4	1,487
State wide	0	0	0	0	0	0	0	0	0	0
<b>Puerto Rico Totals</b>	<b>36</b>	<b>129,172</b>	<b>100</b>	<b>297,977</b>	<b>616</b>	<b>700,948</b>	<b>27</b>	<b>481,146</b>	<b>779</b>	<b>1,609,243</b>
<b>Virgin Islands</b>										
Virgin Islands State wide	1	20,898	3	9,350	3	2,040	29	92,138	36	124,426
<b>Total Community Development Loans</b>	<b>37</b>	<b>150,070</b>	<b>103</b>	<b>307,327</b>	<b>619</b>	<b>702,988</b>	<b>56</b>	<b>573,284</b>	<b>815</b>	<b>1,733,669</b>
Percent #/\$	4.5%	8.7%	12.6%	17.7%	76.0%	40.5%	6.9%	33.1%	100.0%	100.0%

## INVESTMENT TEST

BPPR's investment performance is rated high satisfactory based on good overall performance in Puerto Rico and in the USVI, considering the deteriorating state of the economy in Puerto Rico.

Qualified investments and grants in the Puerto Rico and USVI assessment areas totaled \$195 million during the evaluation period. Of the total, \$114 million or 58% of the dollar amount of qualified investments were new investments made during this evaluation period. New investments included \$11 million in grants and/or donations to organizations providing community development services throughout BPPR's assessment areas. Of total investments, 37 investments for \$81 million were prior period investments. Prior period investments were primarily mortgage backed securities used to finance LMI housing as well as municipal bonds that provided capital improvements to LMI communities.

The majority of BPPR’s qualified investments are municipal bonds for capital improvements and qualified mortgage backed securities. Opportunities for new qualified investment for Puerto Rico and the USVI are scarce due to a deteriorating economy. For the past two years, over 90% of government bond issuances have been utilized to pay everyday expenses or refinance existing debt. In 2014, the liquidity of the Government Development Bank became seriously compromised. Additionally, the government canceled several programs that provided financial incentives to low- or moderate-income first time home buyers. Many of the loan programs had loans guaranteed by agencies of the Puerto Rico government, such as the Puerto Rico Housing Finance Agency, that helped create a secondary market for qualified investments when they were sold and packaged as mortgage backed securities.

The majority of the qualified investments focused on affordable housing and community service activity, which are two areas identified by community contacts as vital community development needs in the assessment area. Exhibit 3 below provides a summary of the types and distribution of qualified investment activity during the evaluation period.

EXHIBIT 3: Qualified Investments										
Assessment Area	Affordable Housing		Economic Development		Community Services		Revitalize and Stabilize		Combined Totals	
	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)	#	(\$000s)
Puerto Rico										
MSA 41980 (San Juan-Caguas-Guaynabo, PR) - FULL SCOPE	0	0	9	6,801	366	109,099	1	17	376	115,917
MSA 10380 (Aguadilla-Isabela-San Sebastian, PR) - FULL SCOPE	0	0	0	0	24	155	0	0	24	155
MSA 38660 (Ponce, PR) - FULL SCOPE	0	0	0	0	27	9,554	0	0	27	9,554
MSA 11640 (Arecibo, PR)	0	0	0	0	18	57	0	0	18	57
MSA 21940 (Fajardo, PR)	0	0	0	0	0	0	0	0	0	0
MSA 25020 (Guayama, PR)	0	0	0	0	4	2	0	0	4	2
MSA 32420 (Mayaguez, PR)	0	0	0	0	21	6,882	0	0	21	6,882
MSA 41900 (San German-Cabo Rojo, PR)	0	0	0	0	4	11	0	0	4	11
MSA 49500 (Yauco, PR)	0	0	0	0	1	18	0	0	1	18
Non-MSA A (Municipalities of Adjuntas, Jayuya, Utuado, Las Marias, Maricao)	0	0	0	0	7	67	0	0	7	67
Non-MSA B (Municipalities of Coamo, Santa Isabel, Salinas)	0	0	0	0	1	1	0	0	1	1
Non-MSA C (Municipalities of Vieques and Culebra)	0	0	1	7	10	45	0	0	11	52
Statewide	35	34,274	3	929	17	26,747	0	0	55	61,950
Puerto Rico Totals										
	35	34,274	13	7,737	500	152,638	1	17	549	194,666
Virgin Islands Statewide - FULL SCOPE										
	0	0	0	0	79	94	0	0	79	94
Total Qualified Investments										
	35	34,274	13	7,737	579	152,732	1	17	628	194,760
Percent #/\$										
	5.6%	17.6%	2.1%	4.0%	92.2%	78.4%	0.2%	0.0%	100.0%	100.0%

## **SERVICE TEST**

BPPR's performance under the service test is rated outstanding based on outstanding performance in both Puerto Rico and the USVI. Delivery systems were readily accessible to geographies and individuals of different income levels and the bank was a leader in providing community development services.

### **Retail Services**

BPPR's branches were readily accessible to all portions of its assessment areas. The bank operated 175 branches, of which 13 (7%) were located in low-income tracts, 37 (21%) were in moderate-income tracts, 65 (37%) were in middle-income tracts, and 58 (33%) were in upper-income tracts and two were in tracts that were not classified. Of the bank's total branches, 50 (28.5%) were in LMI areas, compared to 25% of the assessment areas' population residing in LMI areas. Additionally, 8 of the branches were in distressed and underserved nonmetropolitan middle income geographies.

Alternative delivery systems somewhat enhanced BPPR's performance in its assessment areas, BPPR operated 325 off-site ATM's located throughout its assessment areas, of which 12 (4%) are located in low-income geographies and 59 (18%) are in moderate-income geographies. BPPR offers alternative delivery systems such as bank-by-mail, internet banking, and mobile banking applications for smart phones using Apple and Android technology, 4 interactive retail kiosks, and 13 kiosks for commercial customers. In addition, BPPR provides a 24-hour call center.

BPPR's record of opening and closing ranches did not adversely affect the overall accessibility of its delivery systems to low- and moderate-income geographies. During the evaluation period, BPPR opened two new branches, of which one was located in an LMI area and closed 9 branches, of which four were in LMI areas.

Extended morning, evening and Saturday hours were widely scheduled and tailored to meet the convenience and needs of the assessment areas, particularly LMI geographies and/or LMI individuals. Of the 50 branches in LMI areas, 23 (46%) had extended morning, evening or Saturday hours.

## Community Development Services

BPPR is a leader in providing community development services throughout the assessment areas. The bank's community development service performance was excellent in Puerto Rico and good in the USVI.

<b>COMMUNITY DEVELOPMENT SERVICES</b>	
<b>PURPOSE</b>	<b>#</b>
Financial Education	2,801
Mortgage Education Seminars	68
Technical Assistance	38
Small Business Seminars	22
<b>TOTAL</b>	<b>2,929</b>

During the evaluation period, BPPR provided 2,929 technical community development services. The table above illustrates the level and type of community development services provided. These community development events included sponsorship and participation in a significant number of financial education seminars targeted to LMI individuals, and technical assistance provided to community organizations and small businesses.

The following are examples of community development services that target low- and moderate-income individuals and also provide technical assistance to small businesses and community organizations:

- A financial education program BPPR established in 2013 called Mis Finanzas en Tus Manos, which creates awareness about the importance of effective management of personal finances. The program teaches first-time homebuyer education, retirement education, and saving plans for funding children's education. During 2013 and 2014, 484 activities were conducted reaching 8,395 individuals.
- BPPR conducted the Teach Children to Save program, a national campaign sponsored by the American Bankers Association, which raises awareness about the roles that banks and bankers play in helping young people to develop lifelong savings habits. The program was primarily offered in the public school system in schools where the majority of students qualify for free and reduced rate lunches.
- During 2013 and 2014, BPPR offered training and seminars related to homeownership and affordable housing products and programs through its Vivenda Popular unit. The training and seminars were provided to professional groups, community-based organizations and government agencies.
- BPPR continued to expand an economic development initiative created in 2011 named Echar Pa'lante, which seeks to jumpstart the Puerto Rican economy through a campaign focusing on reducing school absenteeism and providing a support network for entrepreneurs. Examples of this initiative include entrepreneurship workshops for teachers that provided information on how teachers could develop business clubs in their respective schools Made in Puerto Rico Jr., which encourages youths under 18 to develop and promote product made

by them, and School Communities to Echar Pa'lante which consists of a series of activities, tutorships and services designed to improve education, encourage entrepreneurship, and reduce the school absentee rate.

- During 2013 and 2014, the Bank held a series of conferences for business customers across the island on different business topics including re-engineering strategies for enterprises and the available financial alternatives and detailed and up-to-date information concerning the local and global economies.

In addition, 149 BPPR employees served on numerous boards or as key members of committees of 166 community development organizations, providing financial management expertise and technical assistance to these organizations. The missions of these organizations are targeted to providing a wide array of affordable housing and community development services. BPPR provided a total of 260 community development service activities.

#### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”) established the Consumer Financial Protection Bureau (“CFPB”). In general, the Dodd-Frank Act gives the CFPB, among other things, primary supervisory authority over insured depository institutions with total assets of more than \$10 billion when assessing compliance with the requirements of Federal consumer financial laws. The Federal Reserve, however, retains authority to enforce compliance with BPPR’s CRA and certain other consumer compliance laws and regulations.

BPPR is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices was identified as being inconsistent with helping to meet community credit needs.

## COMMONWEALTH OF PUERTO RICO

### *CRA RATING FOR THE COMMONWEALTH OF PUERTO RICO: OUTSTANDING*

*The lending test is rated: Outstanding*  
*The investment test is rated: High Satisfactory*  
*The service test is rated: Outstanding*

Major factors supporting the rating include:

- Lending levels reflect excellent responsiveness to assessment areas' credit needs;
- The geographic distribution of loans reflects good penetration in the bank's assessment areas;
- The distribution of borrowers, reflects, given the products offered, good penetration among customers of different incomes and businesses of different sizes;
- The bank was a leader in community development lending;
- Readily accessible delivery systems to geographies and individuals of different income levels;
- A record of opening and closing of branches, has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals;
- The bank's reasonableness of business hours and services do not vary in a way that inconveniences any portions of the assessment areas;
- A leader in providing community development services;
- A significant level of qualified investments that exhibits excellent responsiveness to credit and community development needs; and,
- Makes extensive use of innovative and/or flexible lending practices in serving assessment area credit needs.

## SCOPE OF EXAMINATION

In order to derive the Commonwealth rating, full-scope assessment areas were weighted based on the proportion of loan originations and deposits in each. As a result, MSA 41980 (San Juan-Caguas-Guaynabo, PR) had a significant impact on assessing the overall performance of the bank, capturing 83% of the branch deposits and 73% of total loans within Puerto Rico. Two additional assessment areas MSA 10380 (Aguadilla-Isabela-San Sebastian, PR) and MSA 38660 (Ponce, PR) that had lesser but important impacts on the overall rating were chosen as full scope assessment areas.

Limited review was conducted of the bank's performance in the other Puerto Rico assessment areas. The combined full-review areas make up 84% of the bank's loans by number and 79% by dollar volume, 81% of the branches, and 91% of deposits in the Commonwealth. BPPR's overall CRA rating is significantly driven by the performance in the Puerto Rico assessment areas, which accounts for 96% of its total retail deposits and 99% of total HMDA-reportable and small business lending activity.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN PUERTO RICO

As of December 31, 2014, BPPR operated the largest bank branch network in Puerto Rico with 167 branches and 323 off-site ATMs. Branches in Puerto Rico account for \$20 billion in deposits or about 96% of the bank's total deposits. Based on deposits reported to the Federal Deposit Insurance Corporation ("FDIC") as of June 30, 2014, BPPR's branch deposits represent 36% of all bank deposits in Puerto Rico. BPPR's Popular Mortgage division also has 28 mortgage centers located throughout the island. BPPR's primary bank competitors in Puerto Rico for assessment area deposits include Firstbank of Puerto Rico, which captured 12% of deposit market share; Oriental Bank, with 9% of deposit market share, Banco Santander Puerto Rico, with 9% of deposit market share and Scotiabank de Puerto Rico, with 7% of deposit market share.

By most measures Puerto Rico's economic activity has been at a depressed level for most of the past year and has shown no signs of recovery. Gross national product ("GNP") declined for five years till 2011 then showed slight gains in 2012 and 2013 but declined in the 2<sup>nd</sup> half of 2013 and continues to be flat.

The leading sectors of Puerto Rico's economy in terms of production and income are manufacturing and services. More than half of all manufacturing done in Puerto Rico is from the pharmaceutical industry. The service industry ranks second to manufacturing, particularly from tourism.

Puerto Rico's labor market is also quite weak. Overall employment fell by 10% between 2006 and 2010 and has leveled off since then. Employment in the private sector has been increasing modestly, but cutbacks in government employment have weighed heavily against private sector gains realized over the past few years. The extent of the economic contraction is manifested in

the poor performance of key sectors such as the labor market, manufacturing, banking activity, tourism, construction and public finances. According to the FRBNY's 2012 "Report on the Competitiveness of Puerto Rico's Economy", Puerto Rico's labor force participation rate is among the lowest in the world, with less than half of eligible workers participating in the formal economy. The FRBNY's 2014 Report "An Update on the Competitiveness of Puerto Rico's Economy", states that labor force participation continues to decline limiting the island's competitiveness.

The unemployment rate remains persistently well above the U.S. mainland's rate, and is especially high for the young and less educated equaling 14.3% for 2013 and improving to 13.9% for 2014.

In a large part because of the poor labor market opportunities for many workers, the island's outmigration has increased significantly, contributing to acceleration of the population decline. Overall, Puerto Rico's population fell from its peak of 3.8 million in 2013 to about 3.6 million in 2014, a loss of 212,000 residents. According to a recent article by FRBNY economists, Puerto Rico is losing a disproportionate share of its younger citizens, especially those from the less educated segments of the population. This has accelerated the pace of the island's aging.

Puerto Rico has faced significant fiscal pressures following years of public-sector deficits, weak economic performance and a faltering in market confidence that has led to a surge in borrowing costs and a near-loss of access to capital markets. The high level of debt has become a dominant feature of the economy and the central focus of its fiscal and economy policy.

### **Composition of Assessment Areas**

The details to the 2014 changes to the assessment areas brought about by the implementation of the Office of Management and Budget's OMB Bulletin 13-01 will be discussed in the individual assessment area sections of this report.

### **Community Contacts**

One community contact was conducted with a nonprofit agency established to bring about collaboration and partnerships among all sectors in Puerto Rico based on citizen empowerment, participatory democracy, accountability, and transparency in order to build Puerto Rico. The agency operates as an advocate for change. Programs include healthcare system reform, public school system reform to improve the quality of education to ensure citizens are educated from early childhood through post high school and macro and micro economy reforms to reduce dependency and improve prosperity. Other programs target the emigration issue stating that policies must target youths 18 to 34 as they represent 60% of the annual emigration from Puerto Rico. The community contact noted that programs must be in place to include this population in the design of business activities, labor, and education so they can compete with offers received from other countries or from the informal economy.

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PUERTO RICO

### LENDING TEST

The bank's lending test performance is rated outstanding based on excellent performance in MSA 41980 (San Juan-Caguas-Guaynabo, PR), and good performance in both MSA 10380 (Aguadilla-Isabella-San Sebastian, PR) and MSA 38660 (Ponce, PR).

#### Lending Activity

Lending activity reflected excellent responsiveness to assessment area credit needs in relation to the bank's capacity and performance context issues. This was determined by evaluating the volume of HMDA-related and small business loans originated during the evaluation period. This conclusion is based on excellent performance in MSA 41980 (San Juan-Caguas-Guaynabo, PR), MSA 10380 (Aguadilla-Isabella-San Sebastian, PR) and MSA 38660 (Ponce, PR). BPPR is the dominant bank in Puerto Rico in terms of market share for deposits, HMDA-related loans and small business loans.

#### Geographic Distribution

The geographic distribution of HMDA-related and small business loans in Puerto Rico reflected good performance in LMI geographies. This conclusion is based on good performance in MSA 41980 (San Juan-Caguas-Guaynabo, PR) and MSA 10380 (Aguadilla-Isabela-San Sebastian, PR) and adequate performance in MSA 38660 (Ponce, PR).

The analysis considered performance context issues, such as lending opportunities reflected in the number of owner-occupied units, and the market aggregate performance. For HMDA-related loans, conclusions were based primarily on performance in moderate-income geographies, as the very low number of owner-occupied housing units in low-income census tracts makes it difficult to extend HMDA-related loans in those geographies.

The geographic dispersion of loans is good overall. There were no significant lending gaps in the assessment areas. For details refer to the "Lending Activity" section of each full scope MSA.

#### Borrower Distribution

The overall distribution of loans among borrowers of different income levels and businesses of different sizes in Puerto Rico was good. This conclusion is based on good performance in MSA 41980 (San Juan-Caguas-Guaynabo, PR), MSA 10380 (Aguadilla-Isabela-San Sebastian, PR), and MSA 38660 (Ponce, PR). The analysis also considered performance context factors, such as the high cost of housing for LMI persons which generally places owner-occupied housing units beyond the reach of LMI families. This disparity also makes the available market for refinancing's for LMI families very limited. Within each assessment area, the median housing

price for each assessment area was compared to that area's median family income levels to assess affordability for LMI borrowers.

### **Community Development Loans**

Banco Popular was a leader in community development lending performance in Puerto Rico and was able to maintain a highly responsive community development lending program despite the difficulties Puerto Rico's economy is undergoing. This conclusion is based on excellent performance in MSA 41980 (San Juan-Caguas-Guaynabo, PR) and MSA 38660 (Ponce, PR) and good performance in MSA 10380 (Aguadilla-Isabela-San Sebastian, PR).

During the evaluation period, BPPR made 779 community development loans in Puerto Rico totaling \$1.6 billion, or approximately 6% of the bank's total assets. This represents 93% of the dollar amount of the bank's total community development lending. The remaining \$124 million or 7% of total community development lending occurred in the USVI. All of the community development lending occurred within the bank's assessment areas. Of this total, \$1.2 billion, or approximately 77% by dollar volume, was originated since the prior CRA evaluation. In comparison to six other banks in Puerto Rico, BPPR is the leading bank in annualized community development lending as a percentage of deposits, tier 1 capital, and average assets.

### **INVESTMENT TEST**

BPPR's performance under the investment test was rated high satisfactory in Puerto Rico. BPPR provided a significant level of qualified community development investments and grants, occasionally in a leadership position, that exhibited excellent responsiveness to credit and community development needs. BPPR's activity in Puerto Rico included 549 qualified investments in Puerto Rico totaling \$194.7 million or close to 100% of the bank's total qualified investments. Of this amount 507 qualified investments were grants and donations totaling \$11.3 million. Assessment area specific investment activity in Puerto Rico was primarily in MSA 41980 (San Juan-Caguas-Guaynabo, PR) with \$116 million or 60% of investments made in the Commonwealth. Island-wide investments that benefited multiple assessment areas totaled \$62 million or 32% of investments in Puerto Rico. Island-wide investments consisted of collateralized mortgage obligations, HUD Section 108 Government Guaranteed Participation Certificates and Puerto Rico Housing and Finance Corporation securities targeting affordable housing development across Puerto Rico.

Investment activities in Puerto Rico consisted of a diverse mix of projects, with 78% of investment dollars targeting community development services to LMI individuals, 4% for economic development, and 18% targeting affordable housing projects. In comparison to six other banks in Puerto Rico, BPPR is the leading bank in annualized qualified investments as a percentage of Tier 1 capital, and ranked third out of six banks as a percentage of deposits and average assets.

## **SERVICE TEST**

BPPR's performance under the service test was rated outstanding in Puerto Rico. This conclusion is based on excellent performance in full scope assessment areas MSA 41980 (San Juan-Caguas-Guaynabo, PR) and MSA 10380 (Aguadilla-Isabela-San Sebastian, PR), and good performance in MSA 38660 (Ponce, PR).

For details regarding the institution's performance in the individual assessment areas, refer to the respective assessment area's "Service Test" section in this report.

### **Retail Services**

Retail delivery systems are readily accessible to all geographies, including low- and moderate-income geographies, individuals of different income levels, and businesses of different revenue sizes in the institution's assessment areas. Retail service distribution was excellent in MSA 41980 (San Juan-Caguas-Guaynabo, PR) and MSA 10380 (Aguadilla-Isabela-San Sebastian, PR), and good in MSA 38660, (Ponce, PR).

The institution's record of opening and closing banking centers has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals. Two branches in LMI geographies in MSA 41980 (San Juan-Caguas-Guaynabo, PR) were closed and another one was opened during the evaluation period while in MSA 10380 (Aguadilla-Isabela-San Sebastian, PR) one branch in LMI geographies was closed while one was opened.

Banking services and business hours do not vary in a way that inconveniences any portions of the assessment areas and are consistent with the services and hours discussed in the "Retail Service" section of the institutional assessment in this report (page 16).

### **Community Development Services**

BPPR is a leader in providing community development services. The bank's performance was excellent in MSA 41980 (San Juan-Caguas-Guaynabo, PR), MSA 10380 (Aguadilla-Isabela-San Sebastian, PR), and in MSA 38660, (Ponce, PR).

Exhibit 4 on the next page highlights additional key assessment area data for the Puerto Rico assessment areas over the evaluation period.

**EXHIBIT 4: Summary of Key Assessment Area Data: Puerto Rico Assessment Areas**

	MSA 41980 San Juan- Caguas- Guaynabo	MSA 10380 Aguadilla- Isabela-San Sebastian	MSA 38660 Ponce	MSA 32420 Mayaguez	MSA 41900 San German- Cabo Rojo	MSA 25020 Guayama	MSA 21940 Fajardo <sup>6</sup>	MSA 49500 Yauco <sup>6</sup>	MSA 11640 Arecibo <sup>7</sup>	Non- MSA Group A	Non- MSA Group B	Non- MSA Group C	TOTALS PUERTO RICO
SCOPE	FULL SCOPE	FULL SCOPE	FULL SCOPE	LIMITED SCOPE	LIMITED SCOPE	LIMITED SCOPE	LIMITED SCOPE	LIMITED SCOPE	LIMITED SCOPE	LIMITED SCOPE	LIMITED SCOPE	LIMITED SCOPE	
<b>Total Population<sup>1</sup></b>	2,478,905	306,292	243,147	106,330	137,462	84,214	70,692	207,333	n/a	85,431	94,864	11,119	3,825,789
Population % of AA population	65%	8%	6%	3%	4%	2%	2%	5%	n/a	2%	2%	0%	100%
<b>Families</b>	607,992	74,617	59,655	26,792	32,865	20,255	17,610	27,312	n/a	19,836	23,538	2,416	912,888
Families % of AA families	67%	8%	7%	3%	4%	2%	2%	3%	n/a	2%	3%	0%	100%
<b>Total Census Tracts<sup>1</sup></b>	622	73	65	31	31	20	21	32	n/a	22	23	5	945
Tracts % AA tracts	66%	8%	7%	3%	3%	2%	2%	3%	n/a	2%	2%	1%	100%
<b>LMI tracts</b>	206	11	24	11	4	2	4	6	n/a	5	3	0	276
LMI tracts % all AA LMI tracts	75%	4%	9%	4%	1%	1%	1%	2%	n/a	2%	1%	0%	100%
<b>Total Owner-Occupied Units<sup>1</sup></b>	595,587	71,368	56,017	24,356	33,784	20,497	18,386	25,469	n/a	17,199	23,108	2,984	888,755
Units % of AA units	67%	8%	6%	3%	4%	2%	2%	3%	n/a	2%	3%	0%	100%
<b>Business Establishments<sup>2</sup></b>	12,781	902	989	643	435	181	245	261	n/a	184	245	77	16,943
Bus. est. % AA bus. est.	75%	5%	6%	4%	3%	1%	1%	2%	n/a	1%	1%	0%	100%
<b>Number of Branches<sup>3</sup></b>	110	13	13	8	4	4	n/a	n/a	6	4	4	1	167
Branches % all branches	66%	8%	8%	5%	2%	2%	n/a	n/a	4%	2%	2%	1%	100%
<b>Branches in LMI tracts</b>	32	3	3	4	0	0	n/a	n/a	3	1	0	0	46
LMI branches % AA LMI branches	70%	7%	7%	9%	0%	0%	n/a	n/a	7%	2%	0%	0%	100%
<b>Branch Deposits (\$'000s)<sup>4</sup></b>	16,462,791	885,110	824,236	569,028	495,036	187,971	n/a	n/a	250,177	96,861	132,698	50,168	19,954,076
Deposits % AA deposits	83%	4%	4%	3%	2%	1%	n/a	n/a	1%	0%	1%	0%	100%
<b>Deposit Mkt Shr. / Rank in Mkt.</b>	33.9%/1	66.1%/1	41.5%/1	48.3%/1	88.7%/1	55.8%/1	n/a	n/a	56.5%/1	100%/1	85.1/1	100%/1	27.4%/1
<b>Home Purchase Originations<sup>5</sup></b>	12,006	879	1,036	332	659	334	439	256	n/a	91	388	18	16,438
HP originations % AA orig.	73%	5%	6%	2%	4%	2%	3%	2%	n/a	1%	2%	0%	100%
<b>Refinance Originations<sup>5</sup></b>	11,227	642	636	263	538	294	304	205	n/a	101	318	12	14,540
Refi orig. % AA orig.	77%	4%	4%	2%	4%	2%			n/a	1%	2%	0%	100%
<b>Home Improvement Originations<sup>5</sup></b>	8,902	764	579	232	615	385	250	316	n/a	255	333	58	12,689
Home Improvement orig. % AA orig.	70%	6%	5%	2%	5%	3%	2%	2%	n/a	2%	3%	0%	100%
<b>Small Business Originations<sup>5</sup></b>	15,400	1,791	1,015	934	736	309	292	398	n/a	295	305	95	21,570
SB orig. % AA orig.	71%	8%	5%	4%	3%	1%	1%	2%	n/a	1%	1%	0%	100%
<b>Combined Loan Totals<sup>5</sup></b>	47,535	4,076	3,266	1,761	2,548	1,322	1,285	1,175	n/a	742	1,344	183	65,237
% of AA Orig.	73%	6%	5%	3%	4%	2%	2%	2%	n/a	1%	2%	0%	100%

Sources: \*2010 ACS Data; 1) Demographic data for 2013; 2) 2013 Dunn & Bradstreet; 3) Branch Numbers as of 12/31/2014; 4) FDIC Summary of Deposit Data as June 30, 2014; 5) Originations include originations and purchases between 01/01/12 and 12/31/13; 6) MSA dissolved as of 1/1/2014; 7) New MSA 2014

## **METROPOLITAN AREA** *(FULL REVIEW)*

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 41980 (San Juan-Caguas-Guaynabo, PR)**

MSA 41980 (San Juan-Caguas-Guaynabo, PR) comprises the largest portion of BPPR's overall retail operations. BPPR operated 110 branch offices in this assessment area, representing 66% of the branches in Puerto Rico, and 63% of BPPR's overall branch network. Of the bank's total lending, this assessment area contains 73% of the combined HMDA-related and small business loans by number and 75% of the dollar volume originated during the review period.

The assessment area is highly competitive, with many multi-regional and large banking institutions operating within the MSA. The assessment area also includes the Commonwealth's capital and government offices, which attracts financial institutions to compete for deposit and lending opportunities in the area. BPPR is the leader in terms of MSA deposits, according to the June 30, 2014 FDIC Summary of Deposit Report. The bank ranked first out of eight financial institutions in the San Juan assessment area with \$16.5 billion in deposits, representing a 34% market share and 83% of all BPPR's deposits in Puerto Rico. Primary competitors in the area include Firstbank of Puerto Rico, Oriental Bank, Banco Santander Puerto Rico, and Scotiabank.

### **Community Contacts**

In order to obtain a better understanding of conditions in the assessment area three community contacts were conducted.

The first contact was a bank that specializes in providing microfinance for women in underserved areas with a goal of empowering low-income women entrepreneurs through affordable micro loans and savings accounts to help them to operate and grow small businesses. The contact noted that there was a need for this type of financing as this is not available from traditional banking activities.

A second contact was with a non-profit agency that works with the homeless population in Puerto Rico. The agency also works to bring together different sectors of the community in order to give them a voice. It provides training programs and provides for the social needs of its homeless community. The contact stated that BPPR by its size controls many of the accounts for the government, managing the food stamp program and accounts of students at universities. BPPR also finances many public housing projects.

A third contact operates a business incubator project that provides office space for small businesses and entrepreneurs. The contact stressed the need for financing programs for small businesses and micro loan programs.

## PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include the U.S. Department of Commerce's Census Bureau (2010), the U.S. Department of Labor, the Federal Reserve Bank of New York's ("FRBNY") 2014 report, "An Update on the Competitiveness of Puerto Rico," selected articles published by economists from the FRBNY, and information provided by Banco Popular. Demographic information for 2013 is based on the U.S. Census Bureau's 2010 American Community Survey ("ACS") census information.

### Demographic Characteristics

MSA 41980 is comprised of 41 municipios which include: San Juan, Aguas Buenas, Aibonito, Arecibo, Barceloneta, Barranquitas, Bayamon, Caguas, Camuy, Canovanas, Carolina, Cataño, Cayey, Ciales, Cidra, Comerico, Corozal, Dorado, Florida, Guaynabo, Gurabo, Hatillo, Humacao, Juncos, Las Piedras, Loiza, Manati, Maunabo, Morovis, Naguabo, Naranjito, Orocovi, Quebradillas, Rio Grande, San Lorenzo, Toa Alta, Toa Baja, Trujillo Alto, Vega Alta, Vega Baja, and Yabucoa. The MSA has 622 census tracts, of which 6% are low-income, 27% are moderate-income, 34% are middle-income, 27% are upper-income geographies and 6% unknown-income. OMB's 2014 census changes to MSA 41980 added the municipios of Ceiba, Fajardo, and Luquillo, to the MSA and removed the municipios of Arecibo, Camuy, Hatillo, and Quebradillas.

According to the 2010 Census based on 2013 census definitions, the population of the assessment area is 2.5 million, representing 65% of the total population of BPPR's Puerto Rico assessment area. There are 607,992 families living in MSA 41980, representing 67% of the total number of families in Puerto Rico. In 2013 a total of 5% of the families reside in low-income geographies and 28% reside in moderate-income geographies while in 2014, 6% of families reside in low-income geographies while 28% reside in moderate-income geographies.

The 2014 OMB changes had little impact on the makeup of the MSA. The population in 2014 was 2.4 million, which is a reduction of 128,779 residents. The number of families declined by 31,120 to 576,872 of which 26.8% are of low-income and 15% are of moderate-income. Total census tracts went from 622 to 598 while LMI tracts went from 206 to 200. For details please see Exhibits 5 and 6 on pages 29 and 30.

### Income Characteristics

The HUD-adjusted median family income ("MFI") for MSA 41980 (San Juan-Caguas-Guaynabo, PR) was \$19,400 for 2012, \$25,000 for 2013 and \$21,700 for 2014. According to the 2010 Census data, 27% of families residing in the MSA are considered low-income, and 15% are moderate-income. The 2014 realignment of the MSA had no impact on these percentages. Overall, 38% of the families in MSA 41980 (San Juan-Caguas-Guaynabo, PR) have incomes below the poverty level in 2013 and 37% in 2014. Significantly, 70.9% of the low-income

population and 52.3% of the moderate-income populations have incomes below the poverty level in 2013. In 2014, the changes are slight reducing to 69.2% for low-income families and 51.2% for moderate-income families. Low incomes and the high levels of poverty experienced throughout the MSA make it difficult for families to afford homes, indicating the need for affordable housing and economic development initiatives.

In 2013, the MSA contained 966,759 housing units, of which 62% were owner-occupied, 23% were rental, and 15% were vacant. Within LMI geographies, the availability of owner-occupied units was limited with only 3% of owner-occupied units located in low-income geographies and 27% in moderate-income geographies. While San Juan boasts the highest HUD-adjusted median family income in Puerto Rico for 2014, the high median housing prices still make homeownership very difficult for LMI borrowers. A comparison of the median family income to the median housing value illustrates the challenges faced by local lenders. According to Census Bureau adjusted data, the median housing value estimate for MSA 41980 (San Juan-Caguas-Guaynabo, PR) in 2014 was about ten times the income of a low-income family and six times the income of a moderate-income family, making it very difficult for LMI families in this MSA to own homes.

According to an article in the July 31, 2015 Global Property Guide for the Caribbean the value of housing stock in Puerto Rico has dropped by 25% since 2007 due to the recession and excess supply. Prices are continuing to fall declining 4.4% in the first quarter of 2014, according to the Federal Housing Finance Agency. Many Puerto Ricans have been forced to sell at a loss given the high unemployment rate which is nearly 14%. Despite the decline in prices, high construction costs, the lack of savings and low-incomes have made qualifying for a loan difficult.

#### Labor, Employment and Economic Characteristics

According to the U.S. Department of Labor statistics, in the San Juan assessment area, unemployment stood at 11.8% for 2013 and 11.7% for 2014. Major employers in the MSA include hospitals, hotels, Walmart and the building trades.

In 2013, the MSA has 12,781 business establishments, of which 77% are small businesses with GAR of less than or equal to \$1 million. Of the total businesses, 6% are located in low-income areas and 23% are located in moderate-income areas.

Additional assessment area demographics can be found in Exhibits 5 and 6 on the following pages.

Exhibit 5 Assessment Area Demographics MSA 41980 - 2013								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	36	5.8	29,613	4.9	20,981	70.9	162,373	26.7
Moderate-income	170	27.3	167,979	27.6	87,788	52.3	90,968	15.0
Middle-income	210	33.8	225,360	37.1	84,091	37.3	93,044	15.3
Upper-income	170	27.3	185,040	30.4	36,553	19.8	261,607	43.0
Unknown-income	36	5.8	0	0.0	0	0	0	0.0
<b>Total Assessment Area</b>	<b>622</b>	<b>100.0</b>	<b>607,992</b>	<b>100.0</b>	<b>229,413</b>	<b>37.7</b>	<b>607,992</b>	<b>100.0</b>
	Housing Units By Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	47,710	16,114	2.7	33.8	25,380	53.2	6,216	13.0
Moderate-income	268,164	158,744	26.7	59.2	66,323	24.7	43,097	16.1
Middle-income	349,958	221,792	37.2	63.4	76,997	22.0	51,169	14.6
Upper-income	300,927	198,937	33.4	66.1	57,181	19.0	44,809	14.9
Unknown-income	0	0	0.0	0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>966,759</b>	<b>595,587</b>	<b>100.0</b>	<b>61.6</b>	<b>225,881</b>	<b>23.4</b>	<b>145,291</b>	<b>15.0</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	753	5.9	593	6.0	120	4.9	40	7.9
Moderate-income	2,920	22.8	2,306	23.4	471	19.4	143	28.2
Middle-income	3,422	26.8	2,659	27.0	653	26.9	110	21.7
Upper-income	5,504	43.1	4,153	42.2	1,142	47.0	209	41.2
Unknown-income	182	1.4	135	1.4	42	1.7	5	1.0
<b>Total Assessment Area</b>	<b>12,781</b>	<b>100.0</b>	<b>9,846</b>	<b>100.0</b>	<b>2,428</b>	<b>100.0</b>	<b>507</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>77.0</b>		<b>19.0</b>		<b>4.0</b>

<b>Exhibit 6</b>								
<b>Assessment Area Demographics</b>								
<b>Assessment Area : MSA 41980 - 2014</b>								
<b>Income Categories</b>	<b>Tract Distribution</b>		<b>Families by Tract Income</b>		<b>Families &lt; Poverty Level as % of</b>		<b>Families by Family Income</b>	
	#	%	#	%	#	%	#	%
Low-income	41	6.9	32,295	5.6	22,355	69.2	154,431	26.8
Moderate-income	159	26.6	158,716	27.5	81,231	51.2	86,528	15
Middle-income	200	33.4	208,637	36.2	75,020	36	89,056	15.4
Upper-income	162	27.1	177,224	30.7	34,839	19.7	246,857	42.8
Unknown-income	36	6	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>598</b>	<b>100</b>	<b>576,872</b>	<b>100.0</b>	<b>213,445</b>	<b>37.0</b>	<b>576,872</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	54,986	18,807	3.3	34.2	27,089	49.3	9,090	16.5
Moderate-income	253,142	150,476	26.5	59.4	61,667	24.4	40,999	16.2
Middle-income	326,516	207,136	36.5	63.4	71,304	21.8	48,076	14.7
Upper-income	289,384	191,013	33.7	66	54,905	19	43,466	15
Unknown-income	1,155	0	0	0	0	0	1,155	100
<b>Total Assessment Area</b>	<b>925,183</b>	<b>567,432</b>	<b>100.0</b>	<b>61.3</b>	<b>214,965</b>	<b>23.2</b>	<b>142,786</b>	<b>15.4</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	237	5	167	5	62	5	8	8.2
Moderate-income	945	20	694	20.6	232	18.6	19	19.6
Middle-income	1,397	29.6	994	29.5	381	30.5	22	22.7
Upper-income	2,057	43.6	1,461	43.3	548	43.9	48	49.5
Unknown-income	83	1.8	57	1.7	26	2.1	0	0
<b>Total Assessment Area</b>	<b>4,719</b>	<b>100.0</b>	<b>3,373</b>	<b>100.0</b>	<b>1,249</b>	<b>100.0</b>	<b>97</b>	<b>100.0</b>
<b>Percentage of Total Businesses</b>				<b>71.5</b>		<b>26.5</b>		<b>2.1</b>

Based on 2010 ACS Information and 2014 D&B Information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 41980 (SAN JUAN-CAGUAS-GUAYNABO, PR)

### LENDING TEST

BPPR's lending test in MSA 41980 (San Juan-Caguas-Guaynabo, PR) was excellent. This conclusion is based on excellent lending activity and being a leader in extending community development loans, and good geographic and borrower distribution performance. Exhibits 5 and 6 on pages 29 and 30 contain data used to evaluate geographic and borrower distribution and Exhibit 2 on page 14 contains data used to evaluate community development lending. Greater weight was given to the analysis of small business lending and home purchase lending

performance followed by refinance and home improvement lending in the analysis of geographic and borrower distribution based on loan volumes. Multi-family lending was only considered in the evaluation of community development lending and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis.

### Lending Activity

Lending activity reflected excellent responsiveness to assessment area credit needs in relation to the bank’s capacity and performance context issues. This was determined based on market share review, and comparisons to peer banks.

Banco Popular was a leader in deposit and loan market share. BPPR ranked first in deposits (market share 34%), first in home purchase lending (market share 41%), second in refinance lending (market share 27%), and first in home improvement lending (market share 70%). In small business lending, BPPR was also first overall (market share 66%). In addition, peer comparisons based on the number of loans per million dollars of deposits indicates that BPPR’s lending volume compares favorably with the performance of similarly situated banks.

Banco Popular responsiveness to meeting the needs of its community is also demonstrated through analysis of conspicuous gaps in lending in low- or moderate-income census tracts. As shown in the chart below BPPR demonstrated excellent responsiveness to the credit needs of the assessment area by having excellent penetration rates in tracts of low- or moderate-income. The following is a summary of the analysis of lending gaps in the assessment area.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2012</b>			
Low	36	5	86%
Moderate	170	0	100%
<b>2013</b>			
Low	36	6	83%
Moderate	170	0	100%
<b>2014</b>			
Low	41	7	83%
Moderate	159	1	99%

### Geographic Distribution

BPPR’s overall geographic distribution of HMDA-related and small business loans was good based on good penetration in moderate-income census tracts and good penetration in low-income census tracts.

According to the 2010 Census, the MSA has 595,587 owner-occupied housing units, of which 16,114 (3%) are located in low-income geographies. Opportunities for HMDA lending increase in the moderate-income census tracts, where 158,744 (27%) owner-occupied housing units are located. Additionally, out of a total of 12,781 small businesses, 753 (6%) are located within low-income tracts, while 2,920 (23%) are located in moderate-income census tracts. Within the MSA 71% of all families in low-income census tracts have incomes below the poverty level while 52% of all families in moderate-income tracts have income below the poverty level. Opportunities for HMDA lending are limited by the high poverty rates prevalent in low- and moderate-income tracts.

### *Home Purchase*

BPPR's home purchase lending distribution in MSA 41980 in low-income geographies was considered good in light of demographic and performance context challenges relating to housing affordability and the availability of owner-occupied housing in low-income geographies in the assessment area. BPPR made 2.5% of its home purchase loans by number in 2012 and 1.7% by dollar volume in low-income geographies. In 2013, 1.6% of BPPR's home purchase loans by number and 1% by dollar volume were in low-income geographies, while 2.7% of all owner-occupied housing units in the assessment area were located in low-income geographies. This performance context consideration is confirmed by the performance of the market aggregate, which in 2013 made 1.7% of its home purchase loans by number and 1.2% by dollar volume in low-income geographies. Home purchase performance in 2014 was comparable to performance in 2013, as 1.8% of home purchase loans by number and 1.1% by dollar volume were in low-income geographies compared to 3.3% of owner-occupied housing units.

BPPR's home purchase lending performance in moderate-income geographies was good in both 2012 and 2013 considering the demographic and performance context challenges that make lending in LMI geographies difficult. BPPR originated 16.5% by number and 13.5% by dollar volume of its home purchase loans in moderate-income geographies in 2012 and 16.1% by number and 11.8% by dollar volume in 2013, compared to 26.7% of owner-occupied housing units located in moderate-income geographies in the MSA. BPPR's performance in moderate-income geographies was below the market aggregate both by number and dollar volume, which made 20% of its home purchase loans by number and 16% by dollar volume in moderate-income geographies in 2012 and 19% by number and 17.2% by dollar volume in 2013. Home purchase lending performance in moderate-income geographies in 2014 was comparable to performance in both 2012 and 2013 as 16.5% of its home purchase loans by number and 13.6% by dollar volume were in moderate-income geographies.

### *Refinance*

BPPR's overall refinance lending performance in the LMI geographies of MSA 41980 was good. BPPR's refinance lending in low-income geographies was good when considering performance context factors that make HMDA-related lending challenging in low-income geographies. According to the 2013 census 2.7% of owner-occupied housing units are in low-income census

tracts. BPPR made 1.5% of its refinance loans by number and 1.2% by dollar volume in 2012 and in 2013 it made 1.7% of its refinance loans by number and 1.2% by dollar volume in low-income geographies. BPPR's performance was below the market aggregate which made 1.9% by number and 1.5% by dollar volume of its refinance loans in 2012 and 2% by number and 3% by dollar volume in 2013 in low-income geographies. BPPR's 2014 refinance lending performance was above its 2013 performance as 2% by number and 1.3% by dollar volume of refinance loans were also in low-income geographies. The aggregate in 2014 made 2.3% by number and 1.7% by dollar volume of its refinance loans in low-income geographies.

BPPR's refinance lending performance in moderate-income geographies was good when considering performance context factors that made -HMDA-related lending in LMI geographies challenging. BPPR originated 12.9% by number and 10.2% by dollar volume of its refinance loans in moderate-income geographies in 2012 and 15% by number and 10.8% by dollar volume in 2013 compared to 26.7% of owner-occupied housing units located in moderate-income geographies in this MSA. BPPR's performance was below the market aggregate in both 2012 and 2013, which originated 15.3% by number and 12% by dollar volume in 2012 and 16.4% by number and 20.6% by dollar volume of its refinance loans in moderate-income census tracts in 2013. BPPR was the market leader in lending in moderate-income tracts with 25% of all refinance loans in moderate-income tracts in 2013. BPPR's 2014 refinance lending performance was comparable to its 2013 performance in moderate-income geographies as 14.4% by number and 10.9% by dollar volume of refinance loans were in moderate-income geographies. BPPR's performance in 2014 was below the aggregate, which made 15.8% by number and 12.1% by dollar volume in moderate-income geographies.

### *Home Improvement*

BPPR's overall home improvement lending performance in the LMI geographies of MSA 41980 was excellent. Home improvement lending in low-income geographies was good when considering performance context factors that make HMDA-related lending challenging in low-income geographies. In 2012, 2.5% by number and 1.9% by dollar volume and in 2013, 2.1% by number and 1.5% by dollar volume of BPPR's home improvement loans were in low-income census tracts while 2.7% of owner-occupied housing units are in low-income census tracts. BPPR was the market leader in home improvement lending in low-income geographies in 2013 having made 70% of all home improvement loans. BPPR's 2014 home improvement lending performance exceeded 2012 and 2013 performance as 3.4% by number and 2.6% by dollar volume of home improvement loans were in low-income geographies. 2014's performance exceeded the aggregate which made 2.9% by number and 1.9% by dollar volume in low-income geographies.

BPPR's home improvement lending performance in moderate-income census tracts was excellent. BPPR originated 30.4% by number and 20.7% by dollar volume in 2012 and 28.7% by number and 19.6% by dollar volume of its home improvement loans in moderate-income census tracts in 2013, compared to 26.7% of owner-occupied housing units located in moderate-income census tracts in this MSA. In 2013 BPPR was the market leader in home improvement

lending in moderate-income tracts with 73% of all home improvement loans. BPPR's 2014 home improvement lending performance was also excellent as 32.5% by number and 24.9% by dollar volume of home improvement loans were in moderate-income geographies compared to 26.5% of owner-occupied housing units.

### *Small Business*

Overall, BPPR's small business lending performance in MSA 41980 was excellent based on excellent performance in both low- and moderate-income geographies. BPPR made 4.4% by number and 4.4% by dollar volume of its small business loans in 2012 and 4.2% by number and 4.5% by dollar volume in 2013 in low-income geographies compared to 6% of business establishments located in low-income geographies in 2012 and 6% in 2013, as reported by D&B. BPPR's performance was similar to the market aggregate which also made 4% by number and 4.2% by dollar volume in 2012 and 3.8% by number and 4% by dollar volume of its small business loans in low-income geographies in 2013. BPPR was the market leader in 2013 in low-income geographies with 74% of all small business loans. BPPR's performance in 2014 exceeded 2012 and 2013's performance, in 2014 BPPR made 4.9% by number and 4.7% by dollar volume of small business loans in low-income geographies. This is comparable to the 5% of business establishments in low-income geographies in 2014 as reported by D & B. BPPR's 2014 performance exceeded the aggregate which made 4.5% by number and dollar volume in low-income geographies.

BPPR's small business performance in moderate-income geographies was excellent. BPPR made 21.6% by number and 20% by dollar volume of its small business loans in 2012, and 21.8% by number and 19.5% by dollar volume in 2013 in moderate-income geographies compared to 19% and 23% of business establishments located in moderate-income geographies in 2012 and 2013, as reported by D&B. BPPR's performance was above the market aggregate by number which made 18.7% by number and 19.7% by dollar volume in 2012 and similar to the aggregate in 2013 as 20.1% by number and 18.4% by dollar volume. BPPR was the market leader in small business loans with 71% of all small business loans in moderate-income geographies. BPPR's performance in 2014 was comparable to 2013's performance as 20.4% by number and 18% by dollar volume<sup>4</sup> were in moderate-income geographies compared to 20% of business establishments as reported by D & B. Performance exceeded the aggregate which made 17.7% by number and 16.6% by dollar volume in middle-income geographies.

### **Distribution by Borrower Income and Revenue Size of Business**

The distribution of loans among borrowers of different income levels and businesses of different sizes was good given the wide disparity between housing prices and incomes, which generally places owner-occupied housing beyond the reach of LMI families. This disparity also makes the available market for refinance loans to LMI families very limited. According to Census Bureau adjusted data, the median housing value for MSA 41980 (San Juan-Caguas-Guaynabo, PR) in 2014 is estimated to be about ten times the income of a low-income family and six times the income of a moderate-income family, making it very difficult for LMI families in this MSA to

own homes. In general, most mortgage lenders consider 3 to 4 times the income of a borrower to be acceptable. The MSA also has a high poverty level with 37% of families in the MSA having incomes below the poverty level. Performance relative to moderate-income borrowers was given the most weight because the income level of low-income borrowers precludes them from most housing-related loans. This rating also considers the excellent penetration among businesses of different sizes.

BPPR's distribution of borrowers in the San Juan-Caguas-Guaynabo assessment area reflected, given the product lines offered, overall good penetration among customers of different income levels and businesses of different sizes. This conclusion is based primarily on adequate HMDA-lending to moderate-income borrowers, and excellent lending to small businesses. BPPR exhibited adequate HMDA-lending performance to low-income borrowers considering the high cost of housing for LMI persons. As noted in the performance context section, the median housing value for MSA 41980 (San Juan-Caguas-Guaynabo, PR) in 2013 is estimated to be about six times the income of a moderate-income family. BPPR exhibited overall excellent performance in home improvement and small business lending.

#### *Home Purchase*

BPPR's home purchase lending to low-income borrowers was considered adequate in consideration of the performance context challenges in lending to low-income borrowers. BPPR made 4 loans in 2013 and 14 home purchase loans in 2012 to low-income borrowers representing less than 1% by number and dollar volume of its home purchase loans in both years. Additionally, in 2014 BPPR made 8 loans or less than 1% by number and dollar volume of its home purchase loans to low-income borrowers. According to demographic data 27% of families in the MSA are of low-income for 2012, 2013 and 2014 respectively. Home purchase performance was comparable to the performance of the aggregate which also made less than 1% by number and dollar volume of its home purchase loans in 2012 and 2013 to low-income borrowers. In 2012 and 2013, BPPR made 10% and 6% of all home purchase loans to low-income borrowers in MSA 41980 (San Juan-Caguas-Guaynabo, PR) ranking third in home purchase lending to low-income borrowers in both years.

Home purchase lending to moderate-income borrowers was considered adequate in both 2013 and 2012 considering the challenges in lending to moderate-income borrowers. As noted above, housing costs are at least 6 times the income of a moderate-income borrower while banks in general consider 3 to 4 times the borrower's income to be acceptable. The MSA also has a high poverty level with 37% of all families with incomes below the poverty level. BPPR's performance was considered good in both 2012 and 2013. BPPR ranked first in terms of home purchase loans made to all moderate-income borrowers in MSA 41980 (San Juan-Caguas-Guaynabo, PR) with 17% and 41% of all home purchase loans in 2012 and 2013. BPPR made 4.1% by number and 1.9% by dollar volume in 2012 and 1.5% by number and .8% by dollar volume in 2013 to moderate-income borrowers when 15% of families in the MSA are of moderate-income in both years. Home purchase performance was below the aggregate which made 7.7% by number and 4.1% by dollar volume in 2012 and 3.9% by number and 1.8% by dollar volume in 2013.

Home purchase performance in 2014 was also considered adequate as 3.5% by number and 1.8% by dollar volume went to moderate-income borrowers while 15% of families in the MSA were of moderate-income. The aggregate made 8.2% of all home purchase loans by number and 4.3% by dollar volume to moderate-income borrowers.

### *Refinance*

Refinance lending to low-income borrowers was considered adequate in both 2012 and 2013 considering the challenges in refinance lending to low-income borrowers. In 2012 and 2013, less than 1% by number and dollar volume of refinance loans were to low-income borrowers compared to the 27% of families in the MSA who are low-income. Performance was below the aggregate which made 1.2% by number and .7% by dollar volume of its refinance loans to low-income borrowers in 2012 and 1% by number and less than 1% by dollar volume in 2013. In 2014, BPPR also made less than 1% by number and dollar volume its refinance loans to low-income borrowers while 27% of families were of moderate-income. 2014's performance was below the aggregate which made 1.9% by number and 1.1% by dollar volume to moderate-income borrowers.

Refinance lending to moderate-income borrowers was adequate considering the performance context issues in refinance lending to moderate-income borrowers. As noted above housing costs are at least 6 times the income of a moderate-income borrower while banks in general consider 3 and 4 times the borrower's income to be acceptable. The MSA also has a high poverty level with 37% of all families with incomes below the poverty level. BPPR made 3% by number and 1.7% by dollar volume in 2012 and 1.9% by number and 1.2% by dollar volume of its refinance loans to moderate-income borrowers in 2013. Fifteen percent of families in the assessment area are of moderate-income. Refinance performance was below the aggregate which made 4.1% by number and 2.4% by dollar volume in 2012 and 3.5% by number and 1.4% by dollar volume of its refinance loans to moderate-income borrowers in 2013. In 2012 and in 2013 BPPR ranked 1<sup>st</sup> in refinance lending to moderate-income borrowers with 15% of all refinance lending in both years. In 2014, BPPR made 3% by number and 1.8% by dollar volume of its refinance loans to moderate-income borrowers compared to 15% of all families in the MSA which are of moderate-income. Performance was below the aggregate which made 6.3% by number and 3.8% by dollar volume to moderate-income borrowers.

### *Home Improvement*

BPPR's home improvement lending to low-income borrowers was excellent considering the performance context which makes lending to LMI borrowers difficult. BPPR ranked 1<sup>st</sup> in the market in home improvement lending to low-income borrowers with 71% of all home improvement loans in 2012 and 61% of all home improvement loans in 2013. BPPR made 7.2% by number and 1.7% by dollar volume of its home improvement loans to low-income borrowers in 2012 and 6.2% by number and 1.2% by dollar volume in 2013 when 27% of all families in the assessment area are low-income. Home improvement performance was comparable to the performance of the aggregate which made 8% by number and 1.8% by dollar volume of its home

improvement loans to low-income borrowers in 2012 and 7.2% by number and 1.7% by dollar volume in 2013. In 2014 BPPR made 9.8% by number and 3.3% by dollar volume of its home improvement loans to moderate-income borrowers while 15% of all families are of moderate-income. Performance was above the aggregate in 2014 which made 9.1% by number and 2.5% by dollar volume of its home improvement loans to low-income borrowers.

Home improvement lending to moderate-income borrowers was also excellent. BPPR's performance was excellent as performance exceeded the demographic and BPPR was the market leader in home improvement loans to moderate-income borrowers with over 85% of the market in 2012 and 70% in 2013. BPPR's responsiveness to the retail credit needs of its assessment areas was excellent. In 2012, BPPR made 22.5% by number and 8.1% by dollar volume of its home improvement loans and 18.9% by number and 5.9% by dollar volume in 2013 of its home improvement loans to moderate-income borrowers when 15% of families in the assessment area are of moderate-income. Home improvement performance was above the aggregate in 2012 which made 21.6% by number and 8.6% by dollar volume of its home improvement loans to moderate-income borrowers and below the aggregate's 19.5% by number and 7.2% by dollar volume in 2013. In 2014, BPPR made 24% by number and 10.7% by dollar volume of its home improvement loans to moderate-income borrowers while 15% of all families are of moderate-income. Performance was above the aggregate which made 21.7% by number and 9.5% by dollar volume of its home improvement loans to moderate-income borrowers.

### *Small Business*

BPPR provided an excellent level of lending to small business borrowers with GAR of \$1 million or less. In 2012 and 2013 respectively, the bank made 70.4% and 70.9% of its small business loans by number and 43.6% and 43% by dollar volume to these businesses, compared to the 77% of business establishments in the MSA with GAR of \$1 million or less in both 2012 and 2013, as reported by D&B. Performance was above the aggregate in both 2012 and 2013 when the aggregate made 58.3% and 64.7% by number and 44.7% and 45.3% by dollar volume of its loans to businesses with GAR of \$1 million or less. BPPR was the market leader in lending to small businesses with GAR of less than \$1 million in the MSA with 63% of all small business loans in 2012 and 57% in 2013. In 2014, BPPR made 70.9% by number and 43% by dollar volume of its small business loans to businesses with GAR of \$1 million or less while 72% of all business have GAR of less than \$1 million as reported by D&B.

Additionally, the bank made 84% and 83% of its small business loans in amounts of \$100,000 or less in 2012 and 2013 respectively. Performance was similar to the aggregate which made 84% of its small business loans in amounts of \$100,000 or less in 2012 and 81% in 2013. In 2014, the bank made 83% of its small business loans in amounts of \$100,000 or less.

Additional assessment area demographics can be found in Exhibit 7 on the following page.

**Exhibit 7**  
**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41980

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	114	1.6%	1.0%	1.7%	1.2%	4	0.1%	0.0%	0.3%	0.1%
Moderate	1,144	16.1%	11.8%	19.0%	17.2%	109	1.5%	0.8%	3.9%	1.8%
Middle	2,422	34.1%	28.4%	35.1%	29.3%	313	4.4%	3.0%	11.6%	7.6%
Upper	3,412	48.1%	58.8%	43.9%	52.2%	1,789	25.2%	33.5%	50.9%	58.7%
Unknown	1	0.0%	0.0%	0.2%	0.2%	4,878	68.8%	62.7%	33.3%	31.7%
<b>Total</b>	<b>7,093</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,093</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	108	1.7%	1.2%	2.0%	3.0%	13	0.2%	0.2%	1.0%	0.4%
Moderate	949	15.0%	10.8%	16.4%	20.6%	121	1.9%	1.2%	3.5%	1.4%
Middle	2,071	32.8%	27.4%	35.2%	28.2%	329	5.2%	3.8%	8.3%	4.0%
Upper	3,191	50.5%	60.6%	46.3%	48.0%	2,179	34.5%	44.2%	41.5%	33.9%
Unknown	0	0.0%	0.0%	0.2%	0.1%	3,677	58.2%	50.7%	45.8%	60.3%
<b>Total</b>	<b>6,319</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,319</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	97	2.1%	1.5%	2.1%	1.5%	283	6.2%	1.2%	7.2%	1.7%
Moderate	1,306	28.7%	19.6%	27.6%	19.6%	859	18.9%	5.9%	19.5%	7.2%
Middle	1,793	39.4%	32.1%	40.4%	33.5%	966	21.2%	10.2%	21.6%	11.8%
Upper	1,353	29.7%	46.8%	29.9%	45.4%	1,953	42.9%	49.5%	44.2%	54.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	488	10.7%	33.2%	7.5%	24.4%
<b>Total</b>	<b>4,549</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,549</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	5.3%	0.4%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	10.0%	12.8%	15.8%	13.2%	0	0.0%	0.0%	0.0%	0.0%
Middle	5	50.0%	84.9%	52.6%	84.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	40.0%	2.3%	26.3%	2.4%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>HMDA Totals</b>									
Low	319	1.8%	1.1%	1.9%	2.3%	300	1.7%	0.2%	1.6%	0.3%
Moderate	3,400	18.9%	11.9%	18.9%	19.3%	1,089	6.1%	1.3%	5.8%	1.7%
Middle	6,291	35.0%	28.8%	35.9%	28.9%	1,608	8.9%	3.8%	11.3%	5.5%
Upper	7,960	44.3%	58.2%	43.1%	49.3%	5,921	32.9%	38.6%	45.3%	43.4%
Unknown	1	0.0%	0.0%	0.2%	0.2%	9,053	50.4%	56.1%	35.9%	49.1%
<b>Total</b>	<b>17,971</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17,971</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
		<b>Bank</b>				<b>Aggregate</b>				
	<b>#</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	
Low	308		4.2%		4.5%		3.8%		4.0%	
Moderate	1,602		21.8%		19.5%		20.1%		18.4%	
Middle	1,984		27.0%		24.3%		26.1%		24.8%	
Upper	3,399		46.2%		50.9%		46.8%		51.9%	
Unknown	65		0.9%		0.8%		0.9%		0.8%	
Tract Unknown	0		0.0%		0.0%		2.3%		0.1%	
<b>Total</b>	<b>7,358</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	
			<b>By Revenue</b>							
\$1 Million or Less	5,214		70.9%		43.0%		64.7%		45.3%	
			<b>By Loan Size</b>							
\$100,000 or less	6,085		82.7%		33.6%		80.9%		28.2%	
\$100,001-\$250,000	741		10.1%		22.0%		10.7%		22.3%	
\$250,001-\$1 Million	532		7.2%		44.4%		8.3%		49.5%	
<b>Total</b>	<b>7,358</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>	

Originations and Purchases

## Community Development Lending

Banco Popular was a leader in community development lending in MSA 41980. Banco Popular's community development lending was highly responsive to the credit needs within the MSA 41980 assessment area. This conclusion was supported by a favorable comparison to similarly-situated large retail banks in the assessment area.

During the evaluation period, community development lending in MSA 41980 totaled 536 loans for \$1.2 billion. This is 75% of all BPPR's community development lending activity in Puerto Rico. The bank originated \$903 million in new qualified community development loans. Within the MSA, efforts were distributed among the applicable categories of community development lending, with an emphasis, in terms of dollar amounts, on community services, revitalization and stabilization, and economic development, as noted in the table above. As noted by community contacts services for LMI individuals and economic development efforts are critical needs in the assessment area.

<b>COMMUNITY DEVELOPMENT LENDING MSA 41980</b>		
<b>PURPOSE</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	23	82,350
Economic Development	68	243,474
Community Services	428	501,893
Revitalize and Stabilize	17	382,672
<b>TOTAL</b>	<b>536</b>	<b>1,210,389</b>

Examples of community development lending include the following:

- A \$29 million loan to construct a hotel and casino in an area marked for redevelopment in the convention center district in Bayamon, PR. The hotel and casino will help revitalize the surrounding LMI areas and provide jobs for LMI individuals.
- Two loans totaling \$28 million to construct 300 residential apartment units for low-income individuals. The property is located in a moderate-income tract in Bayamon, PR. The property is being financed under Puerto Rico Law 124 which establishes maximum sales prices and restricts sales to low- and moderate-income borrowers. The builder in turn receives a partial tax exemption and a reduction in fees.
- A \$35 million term loan for construction and operation of an aluminum can manufacturing facility. The company's financial statement fall within SBIC guidelines<sup>1</sup>. The company expects to create 75 permanent jobs for LMI individuals.

<sup>1</sup> Only companies defined by SBA as "small" are eligible for SBIC financing. Generally, the SBIC Program defines a company as "small" when its net worth is \$18.0 million or less and its average after tax net income for the prior two years does not exceed \$6.0 million. All of the company's subsidiaries, parent companies and affiliates are considered in determining the size standard and for certain industries alternative size standards may apply.

- A \$12.3 million loan to refinance and renovate an existing 300 unit apartment complex in Carolina. Housing is affordable for LMI individuals through subsidies obtained through HUD.

## INVESTMENT TEST

BPPR provided a significant level of qualified community development investments and grants, occasionally in a leadership position in MSA 41980. Of the bank’s total qualified investments in Puerto Rico, \$116 million or 60% was specifically targeted to MSA 41980. The MSA also benefited from \$62 million of island-wide investments in collateralized mortgage obligations, HUD Section 108 Government Guaranteed Participation Certificates and Puerto Rico Housing and Finance Corporation securities targeting affordable housing development across Puerto Rico.

<b>QUALIFIED INVESTMENTS MSA 41980</b>		
<b>PURPOSE</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	0	0
Economic Development	9	6,801
Community Services	366	109,099
Revitalize and Stabilize	1	17
<b>TOTAL</b>	<b>376</b>	<b>115,917</b>

Qualified investment activity also included multiple grants totaling \$8 million to organizations that support community services and economic development for LMI individuals, as well as revitalization and stabilization of LMI communities throughout this assessment area. Qualified investments in MSA 41980 with community development purpose designations are noted in the chart above.

Based on island-wide activities that also benefited the MSA, BPPR made occasional use of innovative qualified investments to support community development initiatives. The bank’s qualified investment activity in MSA 41980 exhibited excellent responsiveness to assessment area credit needs. Qualified investments primarily supported organizations that provide economic development and community development services that benefit LMI families. Of the total qualified investments made in the assessment area, 94% were new investments made since the prior evaluation. BPPR’s investment activity was comparable to similarly-situated banks in this assessment area.

Examples of community development investments include:

- Two bond investments totaling \$100 million to a non-profit a hospital located in a moderate-income community in Caguas, Puerto Rico. The hospital provides health services to the surrounding community, which includes six “Special Communities” as designated under the Special Communities Act and has a high concentration of people living under the poverty level. The hospital and healthcare system also operate residential projects for low-income senior citizens, healthcare services for handicapped or terminally ill patients, and family health centers located in nearby towns surrounding the hospital.

- A \$3.8 million donation to finance construction and renovations to a building that houses 13 non-profit organizations and an umbrella organization that seeks to support collaboration between 13 non-profit organizations that are housed in the facility. All of the non-profit organizations provide programs that benefit LMI individuals and families and promote economic development throughout Puerto Rico.
- A \$250,000 grant to a private non-profit philanthropic organization that sponsors community initiatives addressing community needs in the areas of education health and community leadership, housing, economic development, and the arts and drug prevention.

## **SERVICE TEST**

BPPR's performance under the service test in MSA 41980 (San Juan-Caguas-Guaynabo, PR) was excellent based on leadership in providing community development services. Delivery systems in MSA 41980 (San Juan-Caguas-Guaynabo, PR) were readily accessible to all portions of the assessment area and changes in branch locations did not adversely affect accessibility and BPPR's hours and services are tailored to the convenience and needs of the assessment area.

### **Retail Services**

BPPR's delivery systems in MSA 41980 (San Juan-Caguas-Guaynabo, PR) were readily accessible to all portions of the assessment area. BPPR operated 110 branches in this assessment area, of which 8 (7%) were located in low-income areas and 24 (22%) were in moderate-income areas. This was comparable to the 6% and 28% of the MSA's population that resides in low- and moderate-income areas respectively. The branch network includes a high percentage of branches in shopping centers, which are generally accessible to LMI communities in the MSA by their proximity to bus and transportation routes.

Alternative delivery systems somewhat enhanced the bank's performance in this assessment area, but were not specifically targeted to LMI individuals. BPPR used multiple alternative delivery systems, such as bank-by-mail, internet banking, mobile banking including a mobile application, and 24-hour automated services. BPPR maintained 306 off-site ATMs in the MSA, of which 7 (2%) were located in low-income tracts, and 36 (12%) were in moderate-income tracts. In comparison 6% and 26% of the population resides in low- and moderate-income tracts.

Changes in branch locations have not adversely affected the accessibility of the bank's delivery systems. During the evaluation period, BPPR closed six branches in this assessment area, of which one was in an LMI area. The closed branch was consolidated with a nearby branch in an upper income tract. There are numerous branches of other institutions in the same area. BPPR also opened one branch in another LMI area in a shopping center.

BPPR's hours and services are tailored to the convenience and needs of the assessment area, particularly LMI geographies and/or LMI individuals. Extended morning, late afternoon, weekend and holiday hours were available at branches in this assessment area. Of the 110

branches in the MSA, 64% had early morning, late evening hours or Saturday hours. Of the 32 branches in LMI census tracts, 56% had extended or Saturday hours.

### Community Development Services

BPPR was a leader in providing community development services throughout MSA 41980. BPPR provided 1,950 qualified services. Community development services primarily consisted of financial literacy seminars to LMI individuals. The seminars exhibited excellent responsiveness to the needs of the assessment area. Two of the community contacts discussed the need for financial education across Puerto Rico.

Additionally, 121 BPPR management and staff provided 70 qualified service activities. BPPR staff provided financial management expertise and technical assistance by serving as board or committee members to 62 community development organizations.

Community Development Services	
Financial Literacy Seminars	1,869
Mortgage Education	42
Small Business Seminars	12
Technical Assistance	27
<b>Total</b>	<b>1,950</b>

Examples of community development services include:

- A BPPR Senior Vice President is a member of the Board of Directors of a local community organization that is dedicated to establishing, coordinating and promoting the economic and social development of the Cantera Peninsula, an LMI area in San Juan.
- A BPPR Vice President served as president of a partnership between banks, foundations, and universities that is designed to promote economic development. The organization provides operational and technical assistance to non-profit community based organizations throughout Puerto Rico. The organization also provides training and financing.
- An officer is a member of the Board of Directors of a non-profit organization that provides services to children with physical and / or developmental disabilities with the objective of achieving maximum independence and re-integrating them into the general community and to create employment opportunities for them.
- An officer is a member of the Board of Directors of a local community and economic development corporation. The corporation sponsors four subsidized housing projects with 916 units of affordable housing.

## **METROPOLITAN AREA** *(FULL REVIEW)*

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 10380 (Aguadilla-Isabela-San Sebastian, PR)**

As of December 31, 2014, BPPR operated 13 branches in MSA 10380 (Aguadilla-Isabela-San Sebastian), representing 8% of the bank's total branch network in Puerto Rico. Three of the branches in this assessment area are located in moderate-income tracts. As of June 30, 2014, the MSA branches held \$885 million in deposits, which represents 4% of the bank's deposits in the Commonwealth of Puerto Rico. Of the bank's total lending in Puerto Rico, this assessment area contains 6% percent of HMDA-related and small business loans originated during the review period.

The Aguadilla assessment area is a banking market consisting mostly of large regional institutions with banking offices spread throughout Puerto Rico. BPPR ranked first out of seven financial institutions operating in the MSA, with BPPR holding 66% of the deposit market share, as of June 30, 2014. Other competitors in the area include Firstbank of Puerto Rico, Citibank NA, Oriental Bank, Banco Santander Puerto Rico, and Scotiabank de Puerto Rico.

### **PERFORMANCE CONTEXT**

The following demographic and economic information was obtained from publicly available sources that include the U.S. Department of Commerce's Census Bureau (2010), the U.S. Department of Labor, and FRBNY's 2014 Report, "An Update on the Competitiveness of Puerto Rico".

#### *Demographic Characteristics*

MSA 10380 encompasses the northwestern portion of the island of Puerto Rico. The MSA is comprised of the following eight municipios: Aguadilla, Aguada, Anasco, Isabela, Lares, Moca, Rincon, and San Sebastian. The MSA has 73 census tracts, of which 3% are low-income, 12% are moderate-income, 59% are middle-income, 19% are upper-income geographies, and 7% are unknown-income. According to the 2010 Census, the population of this assessment area is 306,292 and represents 8% of the total population of Puerto Rico. Additionally, there are 74,617 families in the MSA, of which approximately 2% reside in low-income geographies and 10% reside in moderate-income geographies.

The 2014 OMB changes had some impact on the makeup of the MSA, which included the municipio of Utado. The population in 2014 was 339,441, an increase of 10.8% from 2013's population of 306,292. The number of families increased by 10.4% from 74,617 to 82,401 of which 26.1% are of low-income and 14.6% are of moderate-income.

### *Income Characteristics*

According to the 2010 census data, 26% of families residing in the MSA are considered low-income and 15% are moderate-income. Of the total families residing in the MSA, 52% subsist below the poverty level. The HUD-adjusted median family income for MSA 10380 was \$16,600, \$18,200, and \$17,700 for 2012, 2013, and 2014 respectively. Low wages and the very high levels of poverty experienced throughout the MSA makes it extremely difficult for families to afford homes as well as general services, indicating the need for affordable housing and community development service initiatives.

### *Housing Characteristics*

As of 2013, the MSA contains 121,558 housing units, of which 59% are owner-occupied, 21% are rental, and 20% are vacant. Within low-income geographies, the availability of owner-occupied units is limited with less than 1% or a total of 689 housing units are owner-occupied. Moderate-income geographies contain 10% of the owner-occupied units in the MSA. According to Census Bureau adjusted data, the 2014 median housing value for owner-occupied housing units in the MSA is estimated to be \$95,884, which is about eleven times the income of a low-income family and seven times the income of a moderate-income family, making it very difficult for LMI families in this MSA to afford a home purchase.

### *Labor, Employment and Economic Characteristics*

According to the FRBNY's 2014 report, "An Update on the Competitiveness of Puerto Rico's Economy", Puerto Rico's labor force participation rate is among the lowest in the world, with less than half of eligible workers participating in the formal economy. During the evaluation period, unemployment levels slightly decreased, but the unemployment rate remains persistently well above the U.S. mainland's level, and is especially high for the young and less educated. According to the U.S. Department of Labor statistics, the unemployment rate for the MSA was reported at 18.2% in 2014, and 19.7% in 2013.

The FRBNY's report noted that the business environment in Puerto Rico makes it difficult to establish and grow new businesses, and to expand existing ones on the Island. In particular, regulations, high electricity cost, and underdeveloped and costly transportation systems are barriers. The report also noted that a particular need of the Island is initiatives that lower the cost of doing business, indicating that small business assistance is a primary need in Puerto Rico. The MSA has 902 business establishments, of which 84% are small businesses with GAR of less than or equal to \$1 million. Of the total businesses, 2% are located in low-income areas and 9% are located in moderate-income areas.

Additional assessment area demographics can be found in Exhibit 8 and 9 on the following pages.

Exhibit 8 Assessment Area Demographics Assessment Area: MSA 10380 - 2013								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	2.7	1,085	1.5	752	69.3	19,522	26.2
Moderate-income	9	12.3	7,572	10.1	4,815	63.6	10,993	14.7
Middle-income	43	58.9	50,294	67.4	27,435	54.5	12,175	16.3
Upper-income	14	19.2	15,666	21.0	6,110	39	31,927	42.8
Unknown-income	5	6.8	0	0.0	0	0	0	0.0
<b>Total Assessment Area</b>	<b>73</b>	<b>100.0</b>	<b>74,617</b>	<b>100.0</b>	<b>39,112</b>	<b>52.4</b>	<b>74,617</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,325	689	1	29.6	1,027	44.2	609	26.2
Moderate-income	13,034	6,789	9.5	52.1	3,299	25.3	2,946	22.6
Middle-income	80,411	48,190	67.5	59.9	16,510	20.5	15,711	19.5
Upper-income	25,788	15,700	22	60.9	4,970	19.3	5,118	19.8
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>121,588</b>	<b>71,368</b>	<b>100.0</b>	<b>58.7</b>	<b>25,806</b>	<b>21.2</b>	<b>24,384</b>	<b>20.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	16	1.8	12	1.6	3	2.8	1	2.6
Moderate-income	70	7.8	66	8.7	2	1.9	2	5.3
Middle-income	709	78.6	590	77.9	87	81.3	32	84.2
Upper-income	107	11.9	89	11.8	15	14	3	7.9
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>902</b>	<b>100.0</b>	<b>757</b>	<b>100.0</b>	<b>107</b>	<b>100.0</b>	<b>38</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>83.9</b>		<b>11.9</b>		<b>4.2</b>

Based on 2010 ACS Information and 2013 D&B data.

Exhibit 9 Assessment Area Demographics Assessment Area: MSA 10380 - 2014								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	2.5	1,085	1.3	752	69.3	21,504	26.1
Moderate-income	11	13.6	8,776	10.7	5,612	63.9	12,063	14.6
Middle-income	47	58	54,626	66.3	29,880	54.7	13,365	16.2
Upper-income	16	19.8	17,914	21.7	7,119	39.7	35,469	43
Unknown-income	5	6.2	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>81</b>	<b>100</b>	<b>82,401</b>	<b>100.0</b>	<b>43,363</b>	<b>52.6</b>	<b>82,401</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	2,325	689	0.9	29.6	1,027	44.2	609	26.2
Moderate-income	15,363	7,705	9.9	50.2	4,218	27.5	3,440	22.4
Middle-income	87,323	51,919	66.6	59.5	18,251	20.9	17,153	19.6
Upper-income	28,974	17,644	22.6	60.9	5,847	20.2	5,483	18.9
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>133,985</b>	<b>77,917</b>	<b>100.0</b>	<b>58.2</b>	<b>29,343</b>	<b>21.9</b>	<b>26,685</b>	<b>19.9</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	6	1.9	4	1.6	2	4.1	0	0
Moderate-income	31	9.9	28	10.9	3	6.1	0	0
Middle-income	212	67.7	175	68.1	34	69.4	3	42.9
Upper-income	64	20.4	50	19.5	10	20.4	4	57.1
Unknown-income	0	0	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>313</b>	<b>100.0</b>	<b>257</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>82.1</b>		<b>15.7</b>		<b>2.2</b>

Based on 2010 ACS Information and 2014 D&B data.

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## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 10380 (AGUADILLA-ISABELLA-SAN SEBASTIAN)**

### **LENDING TEST**

BPPR's overall lending performance in MSA 10380 (Aguadilla-Isabela-San Sebastian) was good. Exhibit 8 and 9 contain data used to evaluate lending geographic and borrower distribution and Exhibit 2 contains data used to evaluate community development lending. Greater weight was given to the analysis of small business lending and home purchase lending performance followed by refinance and home improvement lending in the analysis of geographic and borrower distribution based on loan volumes. Multi-family lending was only considered in the evaluation of community development lending and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis.

#### **Lending Activity**

Lending Activity reflected excellent responsiveness to assessment area credit needs in relation to the bank's capacity and performance context issues. This was determined based on market share review, trend analysis, and comparison to peer banks.

Banco Popular was a leader in deposit and loan market share. In 2013, BPPR ranked first in deposits (market share 64%), first in home purchase lending (market share 46%), 2<sup>nd</sup> in refinance lending (market share 22%), and first in home improvement lending (market share 66%). In small business lending, BPPR was also first overall (market share 74%). In addition, peer comparisons based on the number of loans per million dollars of deposits indicates that BPPR's lending volume was comparable to the performance of similarly situated banks.

Banco Popular responsiveness to meeting the needs of its community is also demonstrated through analysis of conspicuous gaps in lending in low- or moderate-income census tracts. As shown in the chart below, BPPR demonstrated excellent responsiveness to the credit needs of the assessment area by having excellent penetration rates in tracts of low- or moderate-income.

A summary of the analysis of lending gaps in the assessment area is located on the following page.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2012</b>			
Low	2	0	100%
Moderate	9	0	100%
<b>2013</b>			
Low	2	0	100%
Moderate	9	0	100%
<b>2014</b>			
Low	2	0	100%
Moderate	11	0	100%

### Geographic Distribution

BPPR's overall geographic distribution of HMDA-related and small business loans was good based on good penetration in moderate-income census tracts and adequate penetration in low-income census tracts.

According to the 2010 Census, the MSA has 71,368 owner-occupied housing units, of which 689 (1%) are located in low-income geographies. Opportunities to lend increase in the moderate-income census tracts, where 6,789 (10%) of owner-occupied housing units are located. Additionally, out of a total of 902 small businesses, 16 (2%) are located within low-income tracts, while 70 (8%) are located in moderate-income census tracts. Opportunities to lend are impacted by the high poverty rates prevalent in low- and moderate-income tracts. Within the MSA, 69% of all families in low-income census tracts have incomes below the poverty level while 64% of all families in moderate-income tracts have income below the poverty level.

### *Home Purchase*

BPPR's home purchase lending distribution in MSA 10380 (Aguadilla-Isabela-San Sebastian) was considered adequate in light of demographic and performance context challenges relating to housing affordability and the availability of owner-occupied housing in low-income geographies in the assessment area. Less than 1% by number and dollar volume of BPPR's home purchase loans in 2012 and 2013 were in low-income geographies while 1% of all owner-occupied housing units in the assessment area were located in low-income geographies indicating limited opportunities. This performance context consideration is confirmed by the performance of the market aggregate, which in 2012 made 1.1% by number and 0.7% by dollar volume of its home purchase loans in low-income geographies and in 2013 made 1.5% by number and 1.1% by dollar volume of its home purchase loans in low-income geographies. Home purchase performance in 2014 was comparable to performance in 2013 as the bank made two home purchase loans or less than 1% by number and dollar volume of its home purchase loans in low-

income geographies. Performance was below the aggregate which made 1.8% by number and 1.5% by dollar volume in low-income geographies.

BPPR's home purchase lending performance in moderate-income geographies was overall good based on good performance in 2012 and adequate performance in 2013. BPPR originated 9% by number and 7.3% by dollar volume of its home purchase loans in moderate-income geographies in 2012 and 5.8% by number and 5.5% by dollar volume in 2013. This compares to the 10% of owner-occupied housing units located in moderate-income geographies. BPPR's performance in moderate-income geographies was above the market aggregate in both 2012 and 2013 which made 8.5% by number and 7.6% of its home purchase loans in moderate-income geographies in 2012 and similar to the aggregate's 5.5% by number and 5.3% by dollar volume in 2013. BPPR was the market leader in moderate-income geographies in 2012 and 2013 with 25% in 2012 and 49% in 2013 of all home purchase loans. In 2014, BPPR made 7.5% by number and 6.7% by dollar volume of its home purchase lending performance in moderate-income geographies in 2014 while the aggregate made 8.1% by number and 6.7% by dollar volume in 2014.

### *Refinance*

BPPR's overall refinance lending performance in the LMI geographies of MSA 10380 (Aguadilla-Isabela-San Sebastian) was adequate. BPPR's refinance lending in low-income geographies was adequate when considering performance context factors that make HMDA-related lending challenging in low-income geographies. One percent of owner-occupied housing units are in low-income census tracts, indicating very limited lending opportunities. This is confirmed by the market aggregate which made .9% by number and .8% by dollar volume of its refinance lending in 2012 and 1.2% by number and .9% by dollar volume in 2013. BPPR made less than 1% by number and dollar volume of its refinance loans in 2012 and 2013 in low-income geographies. BPPR's performance was below the market aggregate in 2012 and 2013. BPPR's 2014 refinance lending performance in low-income geographies was comparable to its 2013 performance with 1% by number and less than 1% by number and dollar volume of its refinance loans in low-income geographies. The aggregate made 1.3% by number and dollar volume in low-income geographies.

BPPR's refinance lending performance in moderate-income geographies was adequate. BPPR originated 5.5% by number and 4.7% by dollar volume of its refinance loans in moderate-income geographies in 2012 and 5.4% by number and 5.8% by dollar volume in 2013. This is below the 10% of owner-occupied housing units located in moderate-income geographies in this MSA. BPPR's performance was below the market aggregate in 2012 and 2013, which originated 7% by number and 6% by dollar volume in 2012 and 5.7% by number and 3.8% by dollar volume of its refinance loans in moderate-income census tracts in 2013. BPPR's 2014 refinance lending performance was comparable to its 2012 and 2013 performance in moderate-income geographies with 5.7% by number and 5.4% by dollar volume in moderate-income geographies. The aggregate's performance was comparable with 5.8% by number and 4.7% by dollar volume in moderate-income geographies. BPPR was the market leader in refinance loans in moderate-

income geographies in 2012 and 2013 with 17% of all refinance loans in 2012 and 21% of all refinance loans in 2013.

#### *Home Improvement*

BPPR's overall home improvement lending performance in the LMI geographies of MSA 10380 (Aguadilla-Isabela-San Sebastian) was overall good based on excellent performance in 2012 and good performance in 2013. Home improvement lending in low-income geographies was good when considering performance context factors that make HMDA-related lending challenging in low-income geographies. BPPR originated 1.6% by number and 0.8% by dollar volume in 2012 and 0.9% by number and 0.7% by dollar volume in 2013, of BPPR's home improvement loans were in low-income census tracts, while only 1% of owner-occupied housing units are in low-income census tracts. BPPR's performance was similar to the market aggregate in 2012 which made 1.8% by number and 0.6% by dollar volume and below in 2013 when it made 1.8% by number and 1.1% by dollar volume. BPPR's 2014 home improvement lending performance was below its 2013 performance with less than 1% by number and dollar volume for home improvement loans in low-income geographies. The aggregate also had less than 1% by number and 1.2% by dollar volume in low-income geographies.

BPPR's home improvement lending performance in moderate-income census tracts was excellent. BPPR originated 9.9% by number and 12.4% by dollar volume in 2012 and 8.8% by number and 6.6% by dollar volume in 2013 of its home improvement loans in moderate-income census tracts compared to 10% of owner-occupied housing units located. In 2012 and 2013, BPPR was the market leader in home improvement lending in moderate-income census tracts with 73% of all home improvement loans in 2012 and 63% of all home improvement loans in 2013 in this MSA. BPPR's performance was similar to the market aggregate which also originated 10.4% by number and 11.4% by dollar volume in 2012 and below in 2013 when it originated 9.3% by number and 6.4% by dollar volume of its home improvement loans in moderate-income census tracts. BPPR's 2014 home improvement lending performance was comparable to its 2012 and 2013 performance with 10% by number and 13.5% by dollar volume of its home improvement loans in moderate-income geographies. The aggregate made 11% by number and 12% by dollar volume in moderate-income geographies.

#### *Small Business*

Overall, BPPR's small business lending performance in MSA 10380 (Aguadilla-Isabela-San Sebastian) was excellent based on excellent performance in both low- and moderate-income geographies. BPPR made 4.1% by number and 4.0% by dollar volume of its small business loans in 2012 and 3.8% by number and 3.0% by dollar volume in 2013 in low-income geographies compared to 4% of business establishments located in low-income geographies in 2012 and 2% in 2013 as reported by D&B. BPPR's performance was similar to the market aggregate in 2012, which also made 4% by number and dollar volume and above the aggregate in 2013 which made 3.4% by number and 2.4% by dollar volume of its small business loans in low-income geographies. BPPR's performance in 2014 was comparable to the performance in both years with 4.1% by number and 5.5% by dollar volume of its small business loans in low-

income tracts compared to 2% of business establishments as reported by D&B. In 2014, the aggregate made 4.3% by number and 4.7% by dollar volume in low-income census tracts. BPPR was the market leader for loans in low-income tracts with 80% and 84% of the market in 2012 and 2013, respectively.

BPPR's small business performance in moderate-income geographies was excellent. BPPR made 14.9% and 15.9% by number and 13.9% and 15.5% by dollar volume of its small business loans in 2012 and 2013 in moderate-income geographies in comparison to 14% and 8% of business establishments located in moderate-income geographies as reported by D&B in 2012 and 2013. BPPR's performance was above the market aggregate which made 13.5% and 14.8% by number and 14.0% and 16.4% by dollar volume of its small business loans in moderate-income geographies in 2012 and 2013 respectively. BPPR was the market leader in moderate-income tracts with 85% and 80% of all small business loans in moderate-income tracts in 2012 and 2013 respectively. BPPR's performance in 2014 was also excellent as 16.8% by number and 19.0% by dollar volume of all small business loans were in moderate-income tracts compared to 14% of all business establishments. The aggregate made 14.5% by number and 15.6% by dollar volume in moderate-income geographies.

### **Distribution by Borrower Income and Revenue Size of Business**

BPPR's distribution of borrowers in the Aguadilla-Isabella-San Sebastian assessment area reflects good overall penetration among customers of different income levels and businesses of different sizes. In reaching conclusions about performance, consideration was given to performance context factors, such as the high cost of housing for LMI persons and the high poverty rate of 52% of all families. As noted in the performance context section, the median housing value for the MSA 10380 (Aguadilla-Isabela-San Sebastian) in 2013 is estimated to be about eleven times the income of a low-income family and seven times the income of a moderate-income family. Overall, lending to small businesses was excellent while lending to low-income and moderate-income borrowers overall, was considered adequate.

#### *Home Purchase*

BPPR's home purchase lending to low-income borrowers was considered adequate based on the performance context factors, such as high housing cost, and the high poverty rate of 52% of all families that makes lending to low-incomes in this MSA difficult. BPPR did not make any home purchase loans in 2012 and made only one home purchase loan in 2013 to low-income borrowers representing less than 1% of its home purchase loans to low-income borrowers in both years. Comparisons to the aggregate indicate that no home purchase loans were made by the aggregate to low-income borrowers in 2012 and only one, the BPPR loan was made in 2013. According to demographic data, 26% of families in the MSA are of low-income. In 2014, BPPR did not make any home purchase loans to low-income borrowers while the aggregate made only one.

Home purchase lending to moderate-income borrowers was adequate in both 2012 and 2013 considering the performance context which makes lending to LMI borrowers difficult. BPPR made 14 or 3.2% by number and 1.5% by dollar volume of its home purchase loans in 2012 and 9 or 2% by number and 1.1% by dollar volume of its 2013 home purchase loans respectively to moderate-income borrowers compared to 15% of families in the MSA that are moderate-income. Home purchase performance was similar to the aggregate which made 2.6% by number and 1.3% by dollar volume in 2012 and 2.1% by number and 1.0% by dollar volume of its home purchase loans to moderate-income borrowers in 2012 and 2013 respectively. BPPR was the market leader in home purchase loans to moderate-income borrowers with 50% of all loans in 2012 and 45% in 2013. In 2014, BPPR made 2 home purchase loans or less than 1% by number and dollar volume of total home purchase loans to low-income borrowers. Performance was below the aggregate which made 2.1% by number and .6% by dollar volume of its home purchase loans to moderate-income borrowers.

### *Refinance*

BPPR's refinance lending to low-income borrowers was considered adequate based on the performance context issues and the high poverty rate of 52% of all families that makes lending to low-income families in this MSA difficult. BPPR did not make any refinance loans to low-income borrowers in 2012 and made 1 or less than 1% of BPPR's refinance loans were to low-income borrowers in 2013 compared to the 26% of families in the MSA who are of low-income. Performance was similar to the aggregate which made 3 refinance loans in 2012 and 1 in 2013 to low-income borrowers. In 2014, BPPR did not make any refinance loans to low-income borrowers while the aggregate made 2.

Refinance lending to moderate-income borrowers was adequate considering the performance context which makes lending to LMI borrowers difficult. BPPR made around 1% by number and less than 1% by dollar volume of its refinance loans to moderate-income borrowers in 2012 and 2013 when 15% of families in the assessment area are of moderate-income. Refinance performance was below the aggregate which made 2% by number and 1% by dollar volume of its refinance loans in both 2012 and 2013 to moderate-income borrowers. In 2014 BPPR made 1 loan or less than 1% by number and dollar volume of its refinance loans to moderate-income borrowers compared to the aggregate which made 2% by number and 1.1% by dollar volume.

### *Home Improvement*

BPPR's home improvement lending to low-income borrowers was good considering the performance context which makes lending to LMI borrowers difficult. BPPR was the market leader in home improvement lending to low-income borrowers with 53% of the market in 2012 and 41% in 2013. BPPR made 2% of its home improvement loans to low-income borrowers in both 2012 and 2013 by number and less than 1% by dollar volume while 26% of families in the assessment area are low-income. Home improvement performance was below the performance of the aggregate which made 3.0% and 3.4% by number and 0.6% and 0.9% of its home improvement loans to low-income borrowers in 2012 and 2013, respectively. 2014's home

improvement performance was comparable to 2012 and 2013 as BPPR made 2% by number and less than 1% by dollar volume of its home improvement loans to low-income borrowers. Performance was below the aggregate which made 2.7% by number and less than 1% by dollar volume.

Home improvement lending to moderate-income borrowers was excellent. BPPR was the market leader in home improvement lending with 72% of the market in 2012 and 74% in 2014. BPPR made 10.6% of its home improvement loans by number and 3.9% by dollar volume to moderate-income borrowers in 2012. In 2013, BPPR made 17.7% by number and 5.4% by dollar volume of its home improvement loans to moderate-income borrowers while 15% of families in the assessment area are of moderate-income. Home improvement performance was similar to the aggregate in 2012 which made 11.3% by number and 3.9% by dollar volume of its home improvement loans to moderate-income borrowers and above the aggregate's 15.8% by number and 4.6% by dollar volume in 2013 of home improvement loans to moderate-income borrowers.

### *Small Business*

BPPR provided an excellent level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 76.6% by number and 52.3% by dollar volume of its small business loans to these businesses, compared to the 84% of business establishments in the MSA with GAR of \$1 million or less. Performance was above the aggregate which made 72.3% by number and 58.9% by dollar volume of its loans to businesses with GAR of \$1 million or less. BPPR was the market leader in small business lending in the MSA as BPPR made 73.6% of all small business loans in the MSA in 2013. BPPR's performance in 2012 and 2014 was comparable to 2013 as 73.6% in 2012 and 78.0% in 2014 by number and 56.0% and 60.7% by dollar volume went to businesses with GAR of less than \$1,000,000. Performance in 2014 was above the aggregate which made 73.4% by number and 59.8% by dollar volume to businesses with GAR of less than \$1 million.

The bank made 90% of its small business loans in amounts of \$100,000 or less, which was similar to the aggregate which made 89% of its small business loans in amounts of \$100,000 or less. Typically, the extent to which a bank is willing to extend loans in the amounts of \$100,000 or less is reviewed because small businesses have a greater need for small dollar loans. The average loan size was \$53,000.

Additional assessment area demographics can be found in Exhibit 10 on the following page.

**Exhibit 10**  
**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 10380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	2	0.4%	0.2%	1.5%	1.1%	1	0.2%	0.1%	0.1%	0.0%
Moderate	26	5.8%	5.5%	5.5%	5.3%	9	2.0%	1.1%	2.1%	1.0%
Middle	276	61.9%	59.9%	64.2%	62.3%	25	5.6%	4.1%	9.3%	6.3%
Upper	142	31.8%	34.4%	28.5%	31.0%	188	42.2%	50.9%	62.0%	70.3%
Unknown	0	0.0%	0.0%	0.3%	0.2%	223	50.0%	43.8%	26.5%	22.4%
<b>Total</b>	<b>446</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>446</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	2	0.6%	0.4%	1.2%	0.9%	1	0.3%	0.3%	0.7%	0.3%
Moderate	18	5.4%	5.8%	5.7%	3.8%	4	1.2%	0.6%	2.0%	1.0%
Middle	213	64.2%	63.9%	65.3%	75.3%	12	3.6%	2.4%	8.2%	4.0%
Upper	99	29.8%	30.0%	27.7%	20.0%	197	59.3%	67.2%	60.1%	46.6%
Unknown	0	0.0%	0.0%	0.1%	0.0%	118	35.5%	29.6%	29.0%	48.1%
<b>Total</b>	<b>332</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>332</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	3	0.9%	0.7%	1.8%	1.1%	7	2.1%	0.4%	3.4%	0.9%
Moderate	29	8.8%	6.6%	9.3%	6.4%	58	17.7%	5.4%	15.8%	4.6%
Middle	222	67.7%	65.6%	66.3%	59.9%	68	20.7%	11.9%	22.4%	15.7%
Upper	74	22.6%	27.1%	22.6%	32.6%	185	56.4%	74.4%	56.4%	73.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	3.0%	7.9%	2.0%	5.3%
<b>Total</b>	<b>328</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>328</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	7	0.6%	0.3%	1.4%	1.0%	9	0.8%	0.2%	1.0%	0.2%
Moderate	73	6.6%	5.7%	6.2%	4.4%	71	6.4%	1.2%	4.3%	1.1%
Middle	711	64.3%	61.9%	65.1%	70.8%	105	9.5%	4.0%	10.9%	5.1%
Upper	315	28.5%	32.1%	27.1%	23.8%	570	51.5%	59.1%	60.1%	54.7%
Unknown	0	0.0%	0.0%	0.1%	0.1%	351	31.7%	35.4%	23.7%	38.9%
<b>Total</b>	<b>1,106</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,106</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>			
Low	32	3.8%	3.0%	3.4%	2.4%					
Moderate	134	15.9%	15.5%	14.8%	16.4%					
Middle	485	57.7%	59.8%	57.2%	59.8%					
Upper	190	22.6%	21.7%	22.0%	21.0%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	2.6%	0.3%					
<b>Total</b>	<b>841</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	644	76.6%	52.3%	72.3%	58.9%					
<b>By Loan Size</b>										
\$100,000 or less	760	90.4%	46.7%	89.0%	43.5%					
\$100,001-\$250,000	52	6.2%	21.6%	7.6%	25.6%					
\$250,001-\$1 Million	29	3.4%	31.7%	3.4%	31.0%					
<b>Total</b>	<b>841</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

### Community Development Lending

Banco Popular made a relatively high level of community development loans that were considered highly responsive to the credit needs within MSA 10380 (Aguadilla-Isabela-San Sebastian). During the evaluation period, the bank made a total of 59 loans for \$51 million or 3% of all community development lending activity in Puerto Rico in MSA 10380 (Aguadilla-Isabela-San Sebastian). The bank originated \$32 million in new qualified community development loans.

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>MSA 10380</b>		
<b>PURPOSE</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	0	0
Economic Development	7	9,259
Community Services	50	32,135
Revitalize and Stabilize	2	9,809
<b>TOTAL</b>	<b>59</b>	<b>51,203</b>

Examples of community development lending include the following:

- A \$4 million loan to finance a diagnostic and treatment center in San Sebastian. The facility is the most complete primary care center in the area. The majority of revenues are from LMI patients under the Mi Salud program. The facility supports the adjacent locations of Moca, Lares, Aguadilla, and Isabella, and Las Marias. Additionally five special communities are supported by this facility.
- A \$4.3 million loan to finance the relocation and expansion of a distribution center for a grocery store to a larger location. The property is located in a moderate-income tract. Fifty new jobs for LMI individuals will be created through expansion of the facilities.
- A \$2.3 million SBA 7A loan to a processor and distributor of poultry products. The loan will finance business expansion and create additional jobs for LMI individuals. The facility is located in a low-income tract.

### INVESTMENT TEST

BPPR's investment performance in MSA 10380 (Aguadilla-Isabela-San Sebastian) was considered adequate, consisting of 24 new charitable grants totaling \$155,000 to organizations that support community services for LMI individuals in this assessment area. MSA 10380 (Aguadilla-Isabela-San Sebastian) also benefited from the \$62 million of island-wide investments in collateralized mortgage obligations, HUD Section 108 Government Guaranteed Participation Certificates, and Puerto Rico Housing and Finance Corporation securities targeting affordable housing development across Puerto Rico.

BPPR investments exhibited good responsiveness to the needs of the assessment area. Based on island wide activities that also benefited the MSA, BPPR made occasional use of innovative

qualified investments to support community development initiatives. Examples of community development investments include:

- Charitable donations of \$40,000 to an organization that offers services to children, including children of inmates, people of low-income, and people with addiction problems. Its mission is to minimize the social issues that affect the environment, from the perspective of prevention and intervention.
- Charitable donations totaling \$17,000 to a shelter for children that have been abused or are victims of domestic violence with the goal of providing basic needs and an opportunity for healthy development.

## **SERVICE TEST**

BPPR's performance under the service test in MSA 10380 (Aguadilla-Isabela-San Sebastian, PR) is excellent based on leadership in providing community development services, delivery systems that were readily accessible to all portions of the bank's assessment area, changes in branch locations that did not adversely impact the accessibility of delivery systems, and hours and services that were tailored to the convenience and needs of the assessment area.

### **Retail Services**

BPPR's delivery systems in MSA 10380 (Aguadilla-Isabela-San Sebastian, PR) were readily accessible to all portions of the bank's assessment area, when compared with the percentage of population residing in LMI geographies. BPPR operated 13 branches in this assessment area, of which 3 (23%) were located in moderate-income areas, compared to 12% of the MSA's population residing in LMI areas.

Alternative delivery systems slightly enhanced the bank's performance in this assessment area. BPPR used multiple alternative delivery systems not specifically targeted to LMI individuals, such as bank-by-mail, internet banking, mobile banking including a mobile application, text message banking, and 24-hour automated services. BPPR maintained 19 off-site ATMs in this assessment area MSA, of which 1 (5%) was located in a moderate-income tract.

Changes in branch locations did not adversely impact the accessibility of BPPR's delivery systems, particularly to LMI geographies and/or individuals. During the evaluation period, BPPR opened two branches in the MSA, none of which were in an LMI area. No branches were closed in the MSA during the evaluation period.

BPPR's hours and services are tailored to the convenience and needs of the assessment area, particularly LMI geographies and/or LMI individuals. Extended morning, late afternoon, weekend and holiday hours were available at most branches in this assessment area. Of the 13 branches in the MSA, 79% had early morning, late evening hours or Saturday hours. Of the 3 branches in moderate-income tracts, 67% had extended or Saturday hours.

### Community Development Services

BPPR was a leader in providing community development services in MSA 10380 (Aguadilla-Isabela-San Sebastian). BPPR sponsored 233 financial services-related activities, which primarily consisted of financial education seminars. The table to the right shows the number and type of services provided during the evaluation period.

<b>Community Development Services</b>	
Financial Literacy Seminars	225
Mortgage Education	1
Small Business Seminars	6
Technical Assistance	1
<b>Total</b>	<b>233</b>

In addition, three members of BPPR's management and staff served as directors, advisors, or committee members, providing financial management expertise and technical assistance to two non-profit and community based organizations in the assessment area.

## METROPOLITAN AREA

(FULL REVIEW)

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 38660 (PONCE, PR)

As of December 31, 2014, BPPR operates 13 branches in this assessment area, representing 8% of the bank's total branch network in Puerto Rico. Three of the branches in this assessment area are located in moderate-income tracts. As of June 30, 2014, branches in the MSA held \$824 million in deposits, which represents 4% of the bank's deposits in Puerto Rico. Of the bank's total lending in Puerto Rico, this assessment area contains 5% percent of the HMDA-related and small business loans originated during the review period.

The Ponce assessment area's banking market consists mostly of large regional institutions with banking offices spread throughout Puerto Rico. BPPR ranked first out of six financial institutions operating in the MSA, with BPPR holding a 41% deposit market share, as of June 30, 2014. Other primary competitors in the area include Oriental Bank, Banco Santander Puerto Rico, Firstbank of Puerto Rico, Scotiabank de Puerto Rico, and Doral Bank.

### PERFORMANCE CONTEXT

The following demographic and economic information was obtained from publicly available sources that include the U.S. Department of Commerce's Census Bureau (2010), the U.S. Department of Labor, and FRBNY's 2014 Report, "An Update on the Competitiveness of Puerto Rico".

#### *Demographic Characteristics*

The MSA is Puerto Rico's second largest metropolitan area, encompassing the central southern coastal plain region of the island of Puerto Rico. It includes the municipios of Ponce, Juana Diaz, and Villalba. The MSA has 65 census tracts, of which 5% are low-income, 32% are moderate-income, 25% are middle-income, 34% are upper-income geographies, and 4% of unknown-income. According to the 2010 census, the population of this assessment area is 243,147, representing 6% of the total population of Puerto Rico. Additionally, there are 59,665 families in the MSA, of which approximately 4% reside in low-income geographies and 29% reside in moderate-income geographies. 2014 census changes consolidated the Yauco MSA into the Ponce MSA adding the municipios of Guanica, Guayanilla, Penuelas, and Yauco.

The 2014 OMB changes had a major impact on the makeup of the MSA. The population in 2014 was 350,480, an increase of 44% from 2013's population of 243,147. The number of families increased by 44% from 59,655 to 86,967 of which 27% are of low-income and 14.4% are of moderate-income. Total census tracts increased from 65 to 97. LMI census tracts also increased from 24 to 27. For details please see Exhibits 11 and 12 on pages 60 and 61.

### *Income Characteristics*

According to the 2010 census data, in 2013 27.5% of families residing in the MSA are considered low-income and 14% are moderate-income. Of the total families residing in the MSA, 47% live below the poverty level. The HUD-adjusted median family income for MSA 38660 was \$20,600, \$21,200, and \$19,200 in 2012, 2013, and 2014 respectively.

### *Housing Characteristics*

MSA 38660 contains 92,375 housing units, of which 61% are owner-occupied, 25% are rental, and 14% are vacant. Within low-income geographies, the availability of owner-occupied housing units is very limited, with only 1,122 units (2%) located in low-income geographies. In moderate-income geographies, 15,222 (27%) housing units are owner-occupied. According to Census Bureau adjusted data, the 2014 median housing value for owner-occupied housing units with a mortgage in the Ponce MSA is estimated to be \$92,998, which is about ten times the income of a low-income family and six times the income of a moderate-income family, making it very difficult for LMI families in this MSA to afford housing.

### *Labor, Employment and Economic Characteristics*

The Ponce MSA economy revolves around a mixed-industry manufacturing sector, retail, and tourism. Agriculture and services are also significant factors in the local economy. Ponce is home to Puerto Rico's major seaport and the future Port of the Americas, which is in the process of being expanded to serve as a primary international shipping hub. The seaport is a major driver of the local economy.

Throughout the island of Puerto Rico, unemployment rates remain persistently well above that of the U.S. mainland, and is especially high for the young and less educated. According to the U.S. Department of Labor statistics, the unemployment rate for the MSA was reported at 18% in 2013 and 17.8% in 2014.

The MSA has 989 business establishments, of which 81% are small businesses with GAR of less than or equal to \$1 million. Of total businesses, 1% is located in low-income areas and 48% are located in moderate-income areas. The FRBNY report noted that high underemployment rates on the island and the difficulty in establishing small businesses indicate a need for further economic development.

Detailed performance context data for this assessment area is provided in Exhibits 11 and 12 on the following pages.

<b>Exhibit 11</b>								
<b>Assessment Area Demographics</b>								
<b>Assessment Area: MSA 38660 - 2013</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	4.6	2,271	3.8	1,861	81.9	16,410	27.5
Moderate-income	21	32.3	17,415	29.2	10,896	62.6	8,366	14.0
Middle-income	16	24.6	15,303	25.7	7,449	48.7	9,018	15.1
Upper-income	22	33.8	24,666	41.3	7,510	30.4	25,861	43.4
Unknown-income	3	4.6	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>65</b>	<b>100.0</b>	<b>59,655</b>	<b>100.0</b>	<b>27,716</b>	<b>46.5</b>	<b>59,655</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	3,692	1,122	2.0	30.4	2,165	58.6	405	11
Moderate-income	28,244	15,222	27.2	53.9	8,337	29.5	4,685	16.6
Middle-income	22,903	14,499	25.9	63.3	5,138	22.4	3,266	14.3
Upper-income	37,536	25,174	44.9	67.1	7,478	19.9	4,884	13
Unknown-income	0	0	0.0	0.0	0	0.0	0	0
<b>Total Assessment Area</b>	<b>92,375</b>	<b>56,017</b>	<b>100.0</b>	<b>60.6</b>	<b>23,118</b>	<b>25.0</b>	<b>13,240</b>	<b>14.3</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	11	1.1	7	0.9	4	3.0	0	0.0
Moderate-income	471	47.6	379	47.1	73	54.5	19	38.0
Middle-income	142	14.4	116	14.4	13	9.7	13	26.0
Upper-income	365	36.9	303	37.6	44	32.8	18	36.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>989</b>	<b>100.0</b>	<b>805</b>	<b>100.0</b>	<b>134</b>	<b>100.0</b>	<b>50</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>81.4</b>		<b>13.5</b>		<b>5.1</b>

Based on 2010 ACS Information and 2013 D&B data.

<b>Exhibit 12</b>								
<b>Assessment Area Demographics</b>								
<b>Assessment Area : MSA 38660 - 2014</b>								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	4.1	2,902	3.3	2,262	77.9	23,520	27
Moderate-income	23	23.7	20,268	23.3	13,086	64.6	12,523	14.4
Middle-income	38	39.2	35,292	40.6	18,159	51.5	12,988	14.9
Upper-income	26	26.8	28,505	32.8	8,884	31.2	37,936	43.6
Unknown-income	6	6.2	0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>97</b>	<b>100</b>	<b>86,967</b>	<b>100.0</b>	<b>42,391</b>	<b>48.7</b>	<b>86,967</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>		<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%
Low-income	4,757	1,466	1.8	30.8	2,632	55.3	659	123.9
Moderate-income	32,691	17,856	21.9	54.6	8,567	26.2	6,268	19.2
Middle-income	54,341	33,168	40.7	61	12,173	22.4	9,000	16.6
Upper-income	43,482	28,996	35.6	66.7	8,653	19.9	5,833	13.4
Unknown-income	0	0	0.0	0	0	0	0	0
<b>Total Assessment Area</b>	<b>135,271</b>	<b>81,486</b>	<b>100.0</b>	<b>60.2</b>	<b>32,025</b>	<b>23.7</b>	<b>21,760</b>	<b>16.1</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	8	2	6	2	2	2.1	0	0
Moderate-income	162	39.5	123	40.2	35	36.5	4	50
Middle-income	106	25.9	79	25.8	25	26	2	25
Upper-income	134	32.7	98	32	34	35.4	2	25
Unknown-income	0	0	0	0	26	0	0	0
<b>Total Assessment Area</b>	<b>410</b>	<b>100.0</b>	<b>306</b>	<b>100.0</b>	<b>96</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>
<b>Percentage of Total Businesses</b>				<b>74.6</b>		<b>23.4</b>		<b>2.0</b>

Based on 2010 ACS Information and 2014 D&B Information.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 38660 (PONCE, PR)

### LENDING TEST

BPPR's lending test in MSA 38660 (Ponce, PR) was good. This conclusion is based on excellent lending activity and being a leader in extending community development loans, and good borrower distribution and adequate geographic distribution. Exhibit 13 contains data used to evaluate geographic and borrower distribution and Exhibit 2 contains data used to evaluate community development lending. Greater weight was given to the analysis of small business lending and home purchase lending performance followed by refinance and home improvement lending in the analysis of geographic and borrower distribution based on loan volumes. Multi-family lending was not considered except in the evaluation of community development lending

and small farm lending was not evaluated as lending volumes were insufficient for meaningful analysis.

### Lending Activity

Lending activity reflected excellent responsiveness to assessment area credit needs in relation to the bank’s capacity and performance context issues. This was determined based on market share review, trend analysis, and comparison to peer banks. Banco Popular was a leader in deposit and loan market share. BPPR ranked first in deposits (market share 41%), first in home purchase lending (market share 41%), second in refinance lending (market share 24%), and first in home improvement lending (market share 59%). In small business lending, BPPR was also first overall (market share 56%). In addition, peer comparisons based on the number of loans per million dollars of deposits indicates that BPPR’s lending volume compares favorably with the performance of similarly situated banks.

Banco Popular responsiveness to meeting the needs of its community is also demonstrated through analysis of conspicuous gaps in lending in low- or moderate-income census tracts. As shown in the chart below BPPR demonstrated excellent responsiveness to the credit needs of the assessment area by having excellent penetration rates in tracts of low- or moderate-income. The following is a summary of the analysis of lending gaps in the assessment area.

Tract Income Levels	Number of Tracts	Tracts with no Loans	Penetration
<b>2012</b>			
Low	3	0	100%
Moderate	21	0	100%
<b>2013</b>			
Low	3	0	100%
Moderate	21	0	100%
<b>2014</b>			
Low	4	0	100%
Moderate	23	0	100%

### Geographic Distribution

The geographic distribution of HMDA-related and small business loans was adequate based on adequate home-improvement lending in moderate-income tracts, and good small business lending in moderate-income tracts. Home purchase and refinance performance was considered adequate in low-income tracts as opportunities to lend are limited and poor in moderate-income tracts.

Ponce's assessment area has 56,017 owner-occupied housing units, of which only 1,122 (2%) are located in low-income areas. The low number of owner-occupied units indicates very limited lending opportunities in low-income tracts. The number of businesses in low-income tracts is also very small (11 or 1%) and limits lending opportunities in this area. In moderate-income areas, the number of owner-occupied units (15,222 or 27%) and business establishments (471 or 48%) substantially increases, considerably improving lending prospects. Within the MSA 82% of all families in low-income census tracts have incomes below the poverty level while 63% of all families in moderate-income tracts have income below the poverty level. Opportunities for HMDA lending are limited by the high poverty rates prevalent in low- and moderate-income tracts.

### *Home Purchase*

BPPR's overall home purchase lending performance in the LMI geographies of MSA 38660 (Ponce, PR) was overall adequate based on adequate performance in 2012, 2013 and 2014. BPPR's home purchase lending distribution in MSA 38660 was considered adequate based on performance context, which indicates limited opportunities to lend in low-income tracts in the MSA. Less than 1% of BPPR's home purchase loans in 2012 and 2013 by number and less than 1% by dollar volume were in low-income geographies while 2% of all owner-occupied housing units in the assessment area were located in low-income geographies indicating limited opportunities. Additionally, 82% of all families in low-income tracts have incomes below the poverty level. This performance context consideration is confirmed by the performance of the market aggregate, which in 2012 made 2% or 21 home purchase loans by number and 2% by dollar volume and in 2013 made 1% or a total of 14 of its home purchase loans by number and 1% by dollar volume in low-income geographies.

Home purchase performance in 2014 was comparable to performance in 2013 as the bank made two home purchase loans or less than 1% of its home purchase loans by number and dollar volume in low-income geographies while the aggregate made 18 loans or 2% by number and 1% by dollar volume in low-income geographies.

BPPR's home purchase lending performance in moderate-income geographies was adequate considering the performance context which makes lending in LMI geographies difficult. BPPR originated 7.7% of its home purchase loans by number and 5.9% by dollar volume in moderate-income geographies in 2012 and 8.5% by number and 6.0% by dollar volume in 2013. This compares to the 27% of owner-occupied housing units located in moderate-income geographies. BPPR was the market leader in lending in moderate-income tracts with 31% of the market in 2012 and 21% in 2013. BPPR's performance in moderate-income geographies was below the market aggregate in both 2012 and 2013, which made 11.6% by number and 10% by dollar volume of its home purchase loans in moderate-income geographies in 2012 and 16.5% by number and 7.7% by dollar volume in 2013.

In 2014, BPPR made 4.5% of its home purchase lending performance by number and 3.7% by dollar volume in moderate-income geographies which is below the aggregate which made 9.0%

by number and 7.3% by dollar in moderate-income geographies. In 2014 BPPR ranked second in home purchase lending in moderate-income tracts with 17.8% of the market.

An analysis of conspicuous gaps revealed two low-income census tracts with no HMDA lending. Low-income census tracts have 77.9% of families below the poverty rate in 2014 therefore the absence of HMDA lending is attributable to this factor. There is however, small business lending in these tracts.

### *Refinance*

BPPR's overall refinance lending performance in the LMI geographies of MSA 38660 (Ponce, PR) was considered adequate based on performance context, which indicates limited opportunities for refinance loans in low-income geographies. BPPR's performance in low-income geographies was adequate as BPPR made less than 1% of its refinance loans in 2012 by number and dollar volume in low-income geographies and 1% by number and dollar volume in 2013. Performance was below the market aggregate, which in 2012 made 1% by number and dollar volume and in 2013 made 2% by number and .5% by dollar of its refinance loans in low-income geographies. BPPR's did not make refinance loans in 2014 in low-income geographies while the aggregate made 0.7% by number and 0.5% by dollar volume in low-income geographies.

BPPR's refinance lending performance in moderate-income geographies was considered adequate based on performance context and a high poverty rate of 63% of families residing in moderate-income geographies which limits the opportunities for refinance loans. BPPR originated 8.7% of its refinance loans by number and 7.5% by dollar volume in moderate-income geographies in 2012 and 8.0 % by number and in 6.6% by dollar volume in moderate-income geographies in 2013 compared to 27% of owner-occupied housing units located in moderate-income geographies in this MSA. BPPR's performance was below the market aggregate in 2012 and 2013, which originated 14.4% by number and 11.4% by dollar volume and 15.6% by number and 4.3% by dollar volume of its refinance loans in moderate-income geographies in 2012 and 2013.

BPPR's 2014 refinance lending performance was above its 2012 and 2013 performance in moderate-income geographies when it originated 11.7% by number and 11.2% by dollar volume of its refinance loans. Performance was below the aggregate which originated 14.6% by number and 13.5% by dollar volume in moderate-income census tracts and below the demographic as 22% of owner-occupied housing units were in moderate-income geographies.

### *Home Improvement*

BPPR's overall home improvement lending performance in the LMI geographies of MSA 38660 (Ponce, PR) was overall adequate based on good performance in 2012 and adequate performance in 2013 and 2014. Home improvement lending in low-income geographies was considered adequate based on performance context. In 2012, 1% and less than 1% of BPPR's home

improvement loans by number and dollar volume and in 2013 less than 1% by number and dollar volume were in low-income census tracts, while only 2% of owner-occupied housing units are in low-income census tracts. BPPR's performance was similar to the market aggregate in 2012 and 2013, which made 1% and less than 1% respectively of its home improvement loans in low-income geographies. BPPR's 2014 home improvement lending performance was comparable to its 2013 performance as 1% of home improvement lending by number and .5% by dollar volume were in low-income geographies. In comparison the aggregate made 1.4% by number and 0.8% by dollar volume in low-income geographies.

BPPR's home improvement lending performance in moderate-income census tracts was adequate. BPPR originated 26.5% by number and 19.1% by number of its home improvement loans in moderate-income census tracts in 2012 and 18.7% by number and 12.5% by dollar volume in 2013. This compares to 27% of owner-occupied housing units located in moderate-income census tracts in this MSA. BPPR's performance was similar to the market aggregate which also originated 26% and 16.9% of its home improvement loans in moderate-income census tracts in 2012 and 2013 respectively. In 2012 and 2013, BPPR was the market leader in home improvement lending in moderate-income tracts with 76% and 55% of all home improvement loans. BPPR's 2014 home improvement lending performance was excellent with 22% of its home improvement loans in moderate-income tracts compared to 22% of owner-occupied housing units. BPPR was also the market leader with 56% of all home improvement loans in moderate-income geographies.

### *Small Business*

Overall, BPPR's small business lending performance in MSA 38660 (Ponce, PR) was good based on good performance in both low- and moderate-income geographies. BPPR made 1% of its small business loans in 2012 by number and .3% by dollar volume and 2% by number and .6% by dollar volume in 2013 in low-income geographies compared to 1% of business establishments located in low-income geographies. BPPR's performance was similar to the market aggregate in 2012 and 2013 which made 1% and 2% of its small business loans in low-income geographies in 2012 and 2013, respectively. BPPR's performance in 2014 was excellent as 2.5% by number and 2.3% by dollar volume of small business loans were in low-income tracts compared to 2% of business establishments. The aggregate made 2.7% by number and 3.4% by dollar volume in low-income geographies. BPPR is the market leader with 50% of all small business loans in low-income geographies.

BPPR's small business performance in moderate-income geographies was good as BPPR made 19% by number and 25% by dollar volume in 2012 and 16% by number and 13% by dollar volume in 2013 of its small business loans in moderate-income geographies compared to 20% and 21% of business establishments located in moderate-income geographies in 2012 and 2013, respectively. BPPR's performance was similar to the market aggregate in 2012 and below in 2013 which made 20% by number and 27% by dollar volume in 2012 and 21% by number and dollar volume in 2013 of its small business loans in moderate-income geographies. BPPR was

the market leader for loans in moderate-income tracts with 53% and 44% of the market in 2012 and 2013 respectively.

BPPR's performance in 2014 was excellent as 18% of all small business loans were in moderate-income tracts by number and 17% by dollar volume compared to 14% of all business establishments and the aggregate which made 18.5% by number and 15.5% by dollar volume. BPPR was the market leader in 2014 with 53% of all small business loans.

### **Distribution by Borrower Income and Revenue Size of Business**

BPPR's distribution of borrowers in the Ponce assessment area reflects good overall penetration among customers of different income levels and businesses of different sizes. In reaching conclusions about performance, consideration was given to performance context factors, such as the high cost of housing for LMI persons and the high poverty rate. Overall, lending to small businesses was excellent while lending to low-income and moderate-income borrowers overall, was considered adequate.

#### *Home Purchase*

BPPR's home purchase lending to low-income borrowers was adequate considering the performance context factors such as the high cost of housing where the median value of a home in the MSA is at least 10 times the income of a low-income borrower and that 48% of all families in the MSA have incomes below the poverty level. BPPR made only one home purchase loan in 2012 and in 2013 to low-income borrowers representing less than 1% of its home purchase loans to low-income borrowers in both years and less than 1% by dollar volume. According to demographic data, 27.5% of families in the MSA are of low-income. Home purchase performance was similar to the performance of the aggregate which also made less than 1% in 2012 and 2013 of its home purchase loans to low-income borrowers by number and less than 1% by dollar volume. In 2014, BPPR did not make any home purchase loans to low-income borrowers and the aggregate did not as well.

Home purchase lending to moderate-income borrowers was adequate in both 2013 and 2012. BPPR made 11 or 2% of its home purchase loans in 2013 by number and 1.2% by dollar volume and 34 or 7% by number and 3.8% by dollar volume of its 2012 home purchase loans respectively to moderate-income borrowers when 14% of families in MSA 38660 (Ponce, PR) are of moderate-income. Home purchase performance was similar to the aggregate in 2013 and above the aggregate in 2012. The aggregate made 3% by number and 1% by dollar volume in 2013 and 6% of its home purchase loans by number and 3.5% by dollar volume to moderate-income borrowers in 2012. BPPR also made 2% of its home purchase loans to moderate-income borrowers in 2014 by number and 1% by dollar volume compared to the aggregate which made 2.7% by number and 1% by dollar volume.

### *Refinance*

Refinance lending to low-income borrowers was adequate considering the performance context factors that make refinance lending to low-income borrowers challenging. BPPR made less than 1% of refinance loans by number were to low-income borrowers in 2012 and less than 1% by dollar volume and none in 2013 compared to the 26% of families in the MSA who are of low-income. Performance was below the aggregate in 2013 and 2012 which made less than 1% by number and dollar volume in both years. In 2014, BPPR did not make any refinance loans to low-income borrowers while the aggregate made less than 1% by number and dollar volume to low-income borrowers.

Refinance lending to moderate-income borrowers was adequate considering the performance context factors that make refinance lending to moderate-income borrowers challenging. BPPR made 1% of its refinance loans by number and less than 1% by dollar volume to moderate-income borrowers in both 2013 and 2012 when 15% of families in the assessment area are of moderate-income. Refinance performance was below the aggregate which in 2013 made 3% of its refinance loans by number and less than 1% by dollar volume and in 2012 made 3.4% by number and 2.2% by dollar volume to moderate-income borrowers. In 2014, BPPR's was below the aggregate as BPPR made 2% of its refinance loans by number and 1% by dollar volume to low-income borrowers while the aggregate made 3% by number and 2.0% by dollar volume to moderate-income borrowers.

### *Home Improvement*

BPPR's home improvement lending to low-income borrowers was good considering the performance context which makes lending to LMI borrowers difficult. BPPR made 3% of its home improvement loans to low-income borrowers by number and less than 1% by dollar volume in 2013 and 2.2% by number and less than 1% by dollar volume in 2012 when 26% of families in the assessment area are of low-income. Home improvement performance was below the performance of the aggregate which made 3% by number and less than 1% by dollar volume of its home improvement loans to low-income borrowers in both 2013 and 2012, however the aggregate made only 15 home improvement loans in 2013 and 12 loans in 2012 to low-income borrowers.

In 2014, BPPR made 2% of its home improvement loans by number and less than 1% by dollar volume to low-income borrowers. In comparison, the aggregate made 2.7% by number and less than 1% by dollar volume.

Home improvement lending to moderate-income borrowers was excellent. BPPR made 20% by number of its home improvement loans to moderate-income borrowers by number in both 2013 and 2012, and 5.2% by dollar volume in 2012 and 6.8% in 2013 while 15% of families in the assessment area are of moderate-income. Home improvement performance was above the aggregate, which made 18% of its home improvement loans to moderate-income borrowers by number in 2012 and 2013 and 7% and 8% by dollar volume in 2012 and 2013 respectively.

*Small Business*

BPPR provided an excellent level of lending to small business borrowers with GAR of \$1 million or less. In 2013, the bank made 74% of its small business loans by number and 58% by dollar volume to these businesses, compared to the 81% of business establishments in the MSA with GAR of \$1 million or less. Performance was above the aggregate which made 67% of its loans by number but comparable to the aggregate 51% by dollar volume to businesses with GAR of \$1 million or less. The bank made 87% of its small business loans in amounts of \$100,000 or less, which was above the aggregate which made 82% of its small business loans in amounts of \$100,000 or less. The average loan size was \$72,000 an amount that addresses the needs of small businesses. Performance in 2012 and 2014 was comparable the performance in 2013.

Additional assessment area demographics can be found in Exhibit 13 on the following page.

**Exhibit 13**  
**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 38660

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	4	0.8%	0.4%	1.1%	0.7%	1	0.2%	0.0%	0.6%	0.1%
Moderate	44	8.5%	6.0%	16.5%	7.7%	11	2.1%	1.2%	3.2%	1.1%
Middle	124	24.1%	21.4%	26.5%	51.5%	27	5.2%	4.1%	10.9%	5.8%
Upper	343	66.6%	72.1%	55.7%	40.0%	127	24.7%	34.4%	51.4%	42.0%
Unknown	0	0.0%	0.0%	0.2%	0.1%	349	67.8%	60.2%	34.0%	50.9%
<b>Total</b>	<b>515</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>515</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	4	1.1%	0.8%	1.8%	0.5%	0	0.0%	0.0%	0.4%	0.1%
Moderate	30	8.0%	6.6%	15.6%	4.3%	4	1.1%	0.7%	2.7%	0.6%
Middle	113	30.3%	26.7%	23.5%	10.7%	17	4.6%	3.1%	9.4%	2.3%
Upper	226	60.6%	66.0%	58.8%	84.3%	133	35.7%	42.5%	41.2%	15.4%
Unknown	0	0.0%	0.0%	0.3%	0.1%	219	58.7%	53.6%	46.3%	81.6%
<b>Total</b>	<b>373</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>373</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	1	0.4%	0.0%	0.7%	0.1%	7	2.7%	0.7%	3.4%	1.0%
Moderate	49	18.7%	12.5%	20.0%	17.2%	52	19.8%	6.8%	18.0%	8.0%
Middle	91	34.7%	35.0%	30.3%	26.5%	64	24.4%	14.6%	26.7%	16.7%
Upper	121	46.2%	52.4%	49.0%	56.2%	116	44.3%	60.0%	46.5%	63.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	23	8.8%	18.0%	5.4%	10.7%
<b>Total</b>	<b>262</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>262</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	33.3%	12.9%	33.3%	12.9%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	66.7%	87.1%	66.7%	87.1%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	9	0.8%	0.5%	1.4%	0.6%	8	0.7%	0.1%	0.9%	0.1%
Moderate	124	10.8%	7.0%	16.6%	5.7%	67	5.8%	1.2%	5.0%	0.8%
Middle	328	28.4%	22.3%	25.6%	23.4%	108	9.4%	4.0%	12.4%	3.6%
Upper	692	60.0%	70.1%	56.3%	70.3%	376	32.6%	35.9%	45.8%	24.1%
Unknown	0	0.0%	0.0%	0.2%	0.1%	594	51.5%	58.8%	35.9%	71.3%
<b>Total</b>	<b>1,153</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,153</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank		Aggregate			Bank		Aggregate	
		%	% \$(000s)	%	% \$(000s)		%	% \$(000s)	%	% \$(000s)
Low	10	2.1%	0.6%	2.3%	1.8%		2.3%	1.8%		
Moderate	77	15.8%	13.1%	20.9%	20.8%		20.9%	20.8%		
Middle	114	23.5%	20.4%	20.6%	14.8%		20.6%	14.8%		
Upper	285	58.6%	66.0%	54.3%	62.4%		54.3%	62.4%		
Unknown	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%		
Tract Unknown	0	0.0%	0.0%	1.8%	0.1%		1.8%	0.1%		
<b>Total</b>	<b>486</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	359	73.9%	50.8%	66.6%	51.5%		66.6%	51.5%		
<b>By Loan Size</b>										
\$100,000 or less	424	87.2%	41.2%	81.5%	30.3%		81.5%	30.3%		
\$100,001-\$250,000	35	7.2%	18.6%	10.7%	23.3%		10.7%	23.3%		
\$250,001-\$1 Million	27	5.6%	40.3%	7.7%	46.4%		7.7%	46.4%		
<b>Total</b>	<b>486</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>

Originations and Purchases

### Community Development Lending

Banco Popular was a leader in community development lending in MSA 38660 (Ponce, PR). This conclusion was supported by a favorable comparison to similarly-situated large retail banks in the assessment area. In addition, loans were considered highly responsive to the credit needs within the MSA 38660 assessment area. A total of \$201 million, or 13% of all community development lending activity in Puerto Rico, was conducted in MSA 38660. Of this total, 97% was originated since the prior CRA evaluation. Within the MSA, community development lending efforts in terms of dollar amount were directed at community services and revitalization and stabilization

<b>COMMUNITY DEVELOPMENT LENDING</b>		
<b>MSA 38660</b>		
<b>PURPOSE</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	6	22,697
Economic Development	2	1,215
Community Services	64	101,656
Revitalize and Stabilize	5	75,640
<b>TOTAL</b>	<b>77</b>	<b>201,208</b>

Examples of community development loans included:

- A \$20 million loan to finance the expansion of a mall containing several high end retail stores and tenants. The mall is located in a middle-income tract that is adjacent to several LMI areas. Expansion of the mall will help revitalize the surrounding areas and bring jobs for the residents of the LMI tracts.
- A \$7.8 million loan to a construction company engaged in affordable housing development in the southern and western regions of Puerto Rico.
- A \$6.6 million construction loan for an LIHTC project to renovate an apartment complex containing 96 rental units. All rental units have HUD section 8 HAP financing. Repayment of the construction loan will come from the proceeds of LIHTC financing.
- A \$9 million loan to a hospital that provides several ambulatory clinics at the main location in Ponce as well as clinics in Mayaguez and Aguadilla. Over 52% of patients served in the Ponce facility received insurance through the Mi Salud program which supports LMI individuals.

## **INVESTMENT TEST**

BPPR's investment performance in MSA 38660 (Ponce, PR) was adequate. BPPR provided a total of 27 qualified investments and grants totaling \$9.6 million of which \$9 million went to revitalize and stabilize a moderate-income area and \$600,000 was for community services.

The MSA also benefited from the \$62 million of island-wide investments in collateralized mortgage obligations, HUD Section 108 Government Guaranteed Participation Certificates and Puerto Rico Housing and Finance Corporation securities targeting affordable housing development across Puerto Rico. Qualified investment activity also included numerous charitable grants totaling \$324,000 to organizations that support community services and economic development for LMI individuals.

The bank's qualified investment activity in MSA 38660 (Ponce, PR) exhibited good responsiveness to assessment area needs. Qualified investments primarily consisted of a bond to revitalize a moderate-income community. Of the total qualified investments made in the assessment area, only 3% were new charitable grants made since the prior evaluation. Based on island-wide activities that also benefited the MSA, BPPR made occasional use of innovative qualified to support community development initiatives. Examples of community development investments include:

- \$9 million outstanding on a prior period municipal bond for the City of Ponce to develop an entertainment facility located in a moderate-income community. The development will revitalize the area and bring tourism to the town. Proceeds will be used to develop the first aquarium in Puerto Rico and for the remodeling of a sports complex.
- Charitable donations of \$150,000 to a social and educational center that provides schooling from pre-school to high school, social workers, educational programs for young and adults enabling them to get their GED, and programs directed at combating school dropout rates, teen pregnancy, families with special needs, and domestic violence in Ponce.

## **SERVICE TEST**

BPPR's performance under the service test in MSA 38660 (Ponce, PR) is good, based on leadership in providing community development services delivery systems that were accessible to all portions of the bank's assessment area, changes in branch locations that did not adversely impact the accessibility of delivery systems, and hours and services that were tailored to the convenience and needs of the assessment area. Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems.

## Retail Services

BPPR's delivery systems in MSA 38660 (Ponce, PR) were accessible to essentially all portions of the bank's assessment area, when compared with the percentage of population residing in LMI geographies.

BPPR operated 13 branches in this assessment area, of which three (23%) were located in moderate-income areas, compared to 26% of the MSA's population residing in LMI areas.

Alternative delivery systems somewhat enhanced the bank's performance in this assessment area. BPPR used multiple alternative delivery systems not specifically targeted to LMI individuals, such as bank-by-mail, internet banking, mobile banking including a mobile application, and 24-hour automated services. BPPR maintained 27 off-site ATMs in MSA 38660, of which 7 (26%) were located in moderate-income tracts.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, no branches were either opened or closed.

BPPR's hours and services are tailored to the convenience and needs of the assessment area, particularly LMI geographies and/or LMI individuals. Extended morning, late afternoon, and weekend and holiday hours were available at branches in this assessment area. Of the 13 branches in the MSA, 62% had early morning, late evening hours or Saturday hours. Of the 3 branches in LMI census tracts, all had extended or Saturday hours.

## Community Development Services

BPPR was a leader in providing community development services in MSA 38660 (Ponce, PR). BPPR sponsored 196 financial services-related activities, in MSA 38660 (Ponce, PR), primarily consisting of financial education seminars. The table to the right shows the number and type of services provided.

<b>Community Development Services</b>	
Financial Literacy Seminars	181
Mortgage Education	6
Small Business Seminars	3
Technical Assistance	6
<b>Total</b>	<b>196</b>

In addition, two members of BPPR's management and staff served as directors, advisors, or committee members, providing financial management expertise and technical assistance to two non-profit and community based organizations in MSA 38660 (Ponce, PR).

**METROPOLITAN AND NON-MSAS**

*(LIMITED REVIEW)*

**MSA 32420 (MAYAGUEZ, PR)**

**MSA 41900 (SAN GERMAN-CABO ROJO, PR)**

**MSA 25020 (GUAYAMA, PR)**

**MSA 21940 (FAJARDO, PR)**

**MSA 49500 (YAUCO, PR)**

**NON-MSA A (MUNICIPIOS OF ADJUNTAS, JAYUYA, UTUADO, LAS MARIAS,  
MARICAO, PR)**

**NON-MSA B (MUNICIPIOS OF COAMO, SANTA ISABEL, SALINAS, PR)**

**NON-MSA C (MUNICIPIOS OF CULEBRA, VIEQUES, PR)**

The performance and aggregate information for the assessment areas above can be found in Appendices D. Conclusions regarding performance in the individual limited-review assessment areas are related to the overall Commonwealth of Puerto Rico’s performance. Performance in the limited-scope assessment areas did not change the overall rating for Puerto Rico. Details follow:

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
MSA 32420	Consistent	Consistent	Consistent
MSA 41900	Consistent	Below	Below
MSA 25020	Below	Below	Below
MSA 21940	Below	Below	Below
MSA 49500	Below	Below	Below
Non-MSA A	Below	Below	Below
Non-MSA B	Below	Below	Below
Non-MSA C	Below	Below	Below

## METROPOLITAN AREA (LIMITED REVIEW)

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN MSA 32420 (MAYAGUEZ, PR)

A limited evaluation of BPPR’s performance in MSA 32420 (Mayaguez, PR) was completed. According to the 2010 census Mayaguez has 3% of the total population of Puerto Rico and according to 2013 D&B information 4% of all business establishments. The MSA suffers from high unemployment with an unemployment rate of 18% for 2013 and 43.9% of its families below the poverty rate. Key demographic highlights are listed below:

Assessment Area Demographics – MSA 32420 (Mayaguez, PR)				
<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	5	16.1	5.8	26.6
Moderate Income	6	19.4	7.9	14.4
Middle Income	12	38.7	56.2	16.5
Upper Income	7	22.6	30.0	42.5
Unknown	1	3.2	0.0	0.0
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

During the evaluation period BPPR had 3% of its Puerto Rico lending activity in this MSA and maintains 8 branches. Four of the branches are in LMI census tracts. The 8 branches operating in MSA 32420 (Mayaguez, PR) generated 3% of deposits in Puerto Rico as of June 30, 2014. BPPR is the leading bank in the MSA (1 of 6) with 48.3% of all deposits.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 32420 (Mayaguez, PR)

BPPR’s performance in MSA 32420 (Mayaguez, PR) was consistent with its overall performance in Puerto Rico, which was based on the full-scope assessment area performance.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 32420 Mayaguez, PR	Consistent	Consistent	Consistent

In 2013, BPPR’s lending test performance was good as BPPR was the market leader in both HMDA and small business lending with 43.8% and 73.6% of the market respectively. Geographic and borrower distribution performance was good. Community development lending performance was excellent with \$66.8 million in community development lending or 4% of all BPPR’s community development lending in Puerto Rico. Performance under both the investment and service test’s was also consistent with overall performance as BPPR reported \$6.9 million in qualified investments in the MSA or 4% of qualified investments in Puerto Rico and was a leader in providing community development services in the MSA.

## METROPOLITAN AREA

### (LIMITED REVIEW)

#### DESCRIPTION OF INSTITUTION’S OPERATIONS IN MSA 41900 (SAN GERMAN-CABO ROJO, PR)

A limited evaluation of BPPR’s performance in MSA 41900 (San German-Cabo Rojo, PR) was completed. According to the 2010 census MSA 41900 (San German-Cabo Rojo, PR) has 4% of the total population of Puerto Rico and according to 2013 D&B information 3% of all business establishments. The MSA suffers from high unemployment with an unemployment rate of 21.4% for 2013 and 47.3% of its families below the poverty rate. Key demographic highlights are listed below:

Assessment Area Demographics – MSA 41900 (San German-Cabo Rojo, PR)				
<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	24.2
Moderate Income	4	12.9	15.6	16.2
Middle Income	18	58.1	61.9	16.4
Upper Income	6	19.4	22.5	43.2
Unknown	3	9.7	0.0	0.0
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

During the evaluation period BPPR had 4% of its Puerto Rico lending activity in this MSA and maintains 4 branches. None of the branches are in LMI census tracts. The 4 branches operating in MSA 41900 (San German-Cabo Rojo, PR) generated 2% of deposits in Puerto Rico as of June 30, 2014. BPPR is the leading bank in the MSA (1 of 3) with 88.7% of all deposits.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 41900 (SAN GERMAN-CABO ROJO, PR)

BPPR's performance in MSA 41900 (San German-Cabo Rojo, PR) was not consistent with its overall performance in Puerto Rico, which was based on the full-scope assessment area performance.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 41900	Consistent	Below	Below

In 2013, BPPR's lending test performance was good as BPPR was the market leader in both HMDA and small business lending with 48% and 77% of the market respectively. Geographic and borrower distribution performance was good. Community development lending performance was excellent with \$44.4 million in community development lending or 2.8% of all BPPR's community development lending in Puerto Rico. Performance under both the investment and service test's was below overall performance as BPPR reported \$11,000 in qualified investments in the MSA or less than 1% of qualified investments in Puerto Rico and provides an adequate level of community development services in the MSA.

## METROPOLITAN AREA

### (LIMITED REVIEW)

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 25020 (GUAYAMA, PR)

A limited evaluation of BPPR's performance in MSA 25020 (Guayama, PR) was completed. Located on the Caribbean coast of Puerto Rico the MSA has a population of 84,214 or 2% of the total population of Puerto Rico and 1% of its business establishments according to 2013 D&B information. Unemployment in MSA 25020 (Guayama, PR) was high with an unemployment rate of 23.1% in 2013. The MSA also has high poverty rates with 46% of all families with incomes below the poverty rate.

Key demographic highlights are listed on the chart on the next page.

Assessment Area Demographics – MSA 25020 (Guayama, PR)				
<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	27.8
Moderate Income	2	10.0	6.5	13.2
Middle Income	13	65.0	77.0	15.7
Upper Income	2	10.0	16.4	43.4
Unknown	3	15.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

During the evaluation period 2% of all lending activity was in this MSA. BPPR maintains four branches with 2% of BPPR’s total deposits in Puerto Rico. BPPR is the leading bank in the MSA with 55.8% of all deposits.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 25020 (GUAYAMA, PR)**

BPPR’s performance in MSA 25020 (Guayama, PR) was not consistent with its overall performance in Puerto Rico, which was based on performance in the full-scope assessment areas.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 25020	Below	Below	Below

In 2013, BPPR’s lending test performance was not consistent with the overall lending test rating. BPPR was the market leader in both HMDA and small business lending with 40% and 84% of the market respectively. Geographic distribution was poor while borrower distribution performance was good. Community development lending performance was adequate with \$237,000 in community development lending or less than 1% of all BPPR’s community development lending in Puerto Rico. Performance under both the investment and service test’s was also below overall performance as BPPR reported \$2,000 in qualified investments in the MSA or less than 1% of qualified investments in Puerto Rico and provides an adequate level of community development services in the MSA.

## METROPOLITAN AREA

### (LIMITED REVIEW)

#### DESCRIPTION OF INSTITUTION’S OPERATIONS IN MSA 21940 (FAJARDO, PR)

BPPR’s performance in MSA 21940 (Fajardo, PR) for 2013 was evaluated using the limited scope procedures. Located on the northeast corner of Puerto Rico the assessment area has a population of 70,692 or 2% of the total population of Puerto Rico. According to 2013 D&B information the MSA has 1% of all business establishments. The MSA was consolidated into MSA 41980 (San Juan-Caguas-Guaynabo, PR) in 2014. Unemployment in MSA 21940 (Fajardo, PR) in 2013 was high with an average rate of 17.1% for the year. The assessment area also has a high poverty rate with 39.3% of all families with incomes below the poverty rate. Key demographic highlights are listed below:

Assessment Area Demographics – MSA 21940 (Fajardo, PR)				
<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	1	4.8	2.2	25.9
Moderate Income	3	14.3	14.8	15.1
Middle Income	9	42.9	55.0	17.2
Upper Income	4	19.0	28.0	41.8
Unknown	4	19.0	0.0	0.0
<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

During the evaluation period 1% of all lending activity was in this MSA. BPPR maintains four branches with less than 1% of BPPR’s total deposits in Puerto Rico. Two of the branches were located in LMI census tracts. BPPR is the leading bank in this assessment area (1 of 5) with a market share of 48%.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 21940 (FAJARDO, PR)

BPPR’s performance in MSA 21940 (Fajardo, PR) was not consistent with its overall performance in Puerto Rico, which was based on performance in the full-scope assessment areas.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 21940 (Fajardo, PR)	Below	Below	Below

In 2013, BPPR’s lending test performance was not consistent with the overall lending test rating of outstanding as the lending test performance in MSA 21940 (Fajardo, PR) was adequate. BPPR was the market leader in both HMDA and small business lending with 35% and 71% of the market respectively. Geographic distribution was good while borrower distribution performance was adequate. Community development lending performance was good with \$1.2 million in community development lending or less than 1% of all BPPR’s community development lending in Puerto Rico. Performance under both the investment and service tests was also below with overall performance as BPPR did not report any qualified investments in the MSA and provides an adequate level of community development services in the MSA.

## METROPOLITAN AREA

### (LIMITED REVIEW)

#### DESCRIPTION OF INSTITUTION’S OPERATIONS IN MSA 49500 (YAUCO, PR)

BPPR’s performance in MSA 49500 (Yauco, PR) for 2013 was evaluated using the limited scope procedures. Located on the Caribbean coast of Puerto Rico the assessment area consists of the municipios of Guanica, Guayanilla, Penuelas, and Yauco. The MSA has a population of 207,333 or 5% of the total population of Puerto Rico. According to 2013 Dun and Bradstreet information the MSA has 2% of all business establishments. The MSA was consolidated into MSA 41980 (San Juan-Caguas-Guaynabo, PR) in 2014. Unemployment in 2013 in MSA 49500 (Yauco, PR) was high with an average rate of 21% for the year. The assessment area also has a high poverty rate with 53.7% of all families with incomes below the poverty rate.

Key demographic highlights are listed below:

<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	26.5
Moderate Income	6	18.8	14.9	14.8
Middle Income	17	53.1	62.5	15.4
Upper Income	6	18.8	22.6	43.2
Unknown	3	19.4	0.0	0.0
<b>Total</b>	<b>32</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

During the evaluation period 2% of all lending activity was in this MSA. BPPR maintains four branches with less than 1% of BPPR's total deposits in Puerto Rico. Two of the branches were located in LMI census tracts. BPPR is the leading bank in this assessment area (1 of 4) with a market share of 67%.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 49500 (YAUCO, PR)**

BPPR's performance the MSA was not consistent with its overall performance in Puerto Rico, which was based on performance in the full-scope assessment areas.

Assessment Area	Lending Test	Investment Test	Service Test
MSA 49500 (Yauco, PR)	Below	Below	Below

In 2013, BPPR's lending test performance was not consistent with the overall lending test rating of outstanding as the lending test performance in MSA 49500 (Yauco, PR) was adequate. BPPR was the market leader in both HMDA and small business lending with 44% and 76% of the market respectively. Geographic distribution was good while borrower distribution performance was adequate based on small business performance. Community development lending performance was good with \$17.2 million in community development lending or less than 1% of all BPPR's community development lending in Puerto Rico. Performance under both the investment and service test's was below overall performance as BPPR reported \$18,000 in qualified investments in the MSA and provides an adequate level of community development services in the MSA.

**METROPOLITAN AREA**

**(LIMITED REVIEW)**

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-MSA GROUP A (ADJUNTAS, JAYUYA, UTADO, LAS MARIAS, AND MARICAO, PR)**

A limited evaluation of BPPR's performance in the Non-MSA Group A assessment area, consisting of Adjuntas, Jayuya, Utado, Las Marias, and Maricao municipios, was completed. Non-MSA Group A (Adjuntas, Jayuya, Utado, Las Marias, and Maricao, PR) has a population of 85,431 or 2% of the total population of Puerto Rico and has 1% of all business establishments according to 2013 D&B information.

Unemployment in the five municipios was high with 2013 rates of 23.1%, 18.3%, 19.6%, 24.1% and 21.1% for Adjuntas, Jayuya, Utado, Las Marias, and Maricabo respectively. The assessment

area also has an extremely high poverty rate with 54.5% of all families with incomes below the poverty rate.

Key demographic highlights are listed in the chart below:

Assessment Area Demographics – Non-MSA Group A				
<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	28.9
Moderate Income	5	22.7	18.4	14.9
Middle Income	15	68.2	70.6	14.8
Upper Income	2	9.1	11.1	41.4
Unknown	0	0.0	0.0	0.0
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

During the evaluation period 1% of all lending activity was in this assessment area. BPPR maintains four branches with one of the branches located in a LMI census tract.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-MSA GROUP A (ADJUNTAS, JAYUYA, UTDO, LAS MARIAS, AND MARICAO, PR)**

BPPR’s performance in Non-MSA Group A (Adjuntas, Jayuya, Utado, Las Marias, and Maricao, PR) was not consistent with its overall performance in Puerto Rico, which was based on performance in the full-scope assessment areas.

Assessment Area	Lending Test	Investment Test	Service Test
Non-MSA Group A	Below	Below	Below

In 2013, BPPR’s lending test performance was not consistent with the overall lending test rating of outstanding as the lending test performance in this assessment area was adequate. BPPR was the market leader in both HMDA and small business lending with 47% and 84% of the market respectively. Geographic distribution was adequate while borrower distribution performance was good based on home improvement and small business performance although opportunities for home purchase and refinance lending were limited by high unemployment and poverty rates. Community development lending performance was adequate with \$375,000 in community development lending or less than 1% of all BPPR’s community development lending in Puerto Rico. Performance under both the investment and service test’s was also below with overall performance as BPPR reported \$67,000 in qualified investments in Non-MSA Group A (Adjuntas, Jayuya, Utado, Las Marias, and Maricao, PR) or less than 1% of qualified investments in Puerto Rico and provides an adequate level of community development services in the assessment area.

## METROPOLITAN AREA

### (LIMITED REVIEW)

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-MSA GROUP B (COAMO, SANTA ISABEL, AND SALINAS, PR)

A limited evaluation of BPPR's performance in the Non-MSA Group B assessment area, consisting of the Coamo, Santa Isabel, and Salinas municipios, was completed. Located on the Caribbean coast of Puerto Rico the three municipios have a population of 94,864 or 2% of the total population of Puerto Rico and 1% of its business establishments according to 2013 D&B information. Unemployment in the three municipios was high with 2013 rates of 20.2%, 25.6%, and 19% for Coamo, Salinas, and Santa Isabel respectively. The three municipios also have high poverty rates with 51% of all families with incomes below the poverty rate.

Key demographic highlights are listed below:

Assessment Area Demographics – Non-MSA Group B				
<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	27.3
Moderate Income	3	13.0	8.4	14.2
Middle Income	12	52.2	58.7	15.0
Upper Income	6	26.1	32.9	43.5
Unknown	2	8.7	0.0	0.0
<b>Total</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

During the evaluation period 2% of all lending activity was in this assessment area. BPPR maintains four branches with 2% of BPPR's total deposits in Puerto Rico. None of the branches were in LMI census tracts. BPPR is the leading bank in this assessment area (1 of 3) with a market share of 85%.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-MSA GROUP B (COAMO, SANISABEL AND SALINAS, PR)

BPPR's performance in Non-MSA Group B was not consistent with its overall performance in Puerto Rico, which was based on performance in the full-scope assessment areas.

Assessment Area	Lending Test	Investment Test	Service Test
Non-MSA Group B	Below	Below	Below

In 2013, BPPR's lending test performance was not consistent with the overall lending test rating of outstanding as the lending test performance in this assessment area was adequate. BPPR was the market leader in both HMDA and small business lending with 38% and 73% of the market respectively. Geographic distribution was adequate while borrower distribution performance was good. Community development lending performance was good with \$12.4 million in community development lending or 1% of all BPPR's community development lending in Puerto Rico. Performance under both the investment and service test's was also below with overall performance as BPPR reported \$1,000 in qualified investments in the assessment area or less than 1% of qualified investments in Puerto Rico and provides an adequate level of community development services in the assessment area.

## **METROPOLITAN AREA**

### **(LIMITED REVIEW)**

#### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN NON-MSA GROUP C (CULEBRA AND VIEQUES, PR)**

A limited evaluation of BPPR's performance in the Non-MSA Group C assessment area, consisting of the islands of Culebra and Vieques was completed. The two islands are located off the eastern coast of Puerto Rico in the Atlantic Ocean. According to the 2010 census the two islands have a total population of 11,119 or less than 1% the total population of Puerto Rico. The two islands, according to 2013 D&B information have 77 business establishments or less than 1% of all business establishments in Puerto Rico. Unemployment on Culebra is 6.75% in 2013 while on Vieques it was higher 15.9% in 2013. The islands also have high poverty rates with 43% of all families with incomes below the poverty rate.

Key demographic highlights are listed below:

Assessment Area Demographics – Non-MSA Group C				
<i>Income Category</i>	<i>Tract Distribution</i>		Percentage of Owner Occupied Housing Units by Tract	Percentage of Families by Income Level
	#	%		
Low Income	0	0.0	0.0	20.8
Moderate Income	0	0.0	0.0	12.5
Middle Income	2	40.0	84.3	17.3
Upper Income	1	20.0	15.7	49.4
Unknown	2	40.0	0.0	0.0
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

During the evaluation period less than 1% of all lending activity was on these islands as opportunities are limited. BPPR maintains one branch on each island and there are no competitor banks on the islands. The islands do not have LMI census tracts.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-MSA GROUP C (CULEBRA AND VIEQUES, PR)**

BPPR’s performance on the islands of Culebra and Vieques was not consistent with its overall performance in Puerto Rico, which was based on the full-scope assessment area performance.

Assessment Area	Lending Test	Investment Test	Service Test
Non-MSA C	Below	Below	Below

In 2013, BPPR’s lending test performance was good as BPPR was the market leader in both HMDA and small business lending with 58% and 77% of the market respectively. Borrower distribution performance was adequate based on excellent small business performance. Community development lending performance was adequate with four loans totaling \$1.5 million. Performance under both the investment and service test’s was also below overall performance as BPPR reported donations totaling \$52,000 in the assessment area or less than 1% of qualified investments in Puerto Rico and provides an adequate level of community development services.

## UNITED STATES VIRGIN ISLANDS

### *CRA RATING FOR UNITED STATES VIRGIN ISLANDS: SATISFACTORY*

*The lending test is rated: High Satisfactory*

*The investment test is rated: Low Satisfactory*

*The service test is rated: Outstanding*

Major factors supporting the rating include:

- The lending levels reflect good responsiveness to the assessment area credit needs;
- The geographic distribution of loans reflects adequate penetration throughout the bank's assessment area;
- The distribution of borrowers reflects, given the products offered, good penetration among customers of different income levels and businesses of different sizes;
- The bank was a leader in community development lending;
- An adequate level of qualified investments that exhibits adequate responsiveness to credit and community development needs;
- Readily accessible delivery systems to geographies and individuals of different income levels;
- Branch openings and closures have not adversely affected the accessibility of the bank's delivery systems, particularly by LMI geographies and/or LMI individuals;
- The bank has reasonable business hours and services that do not vary in a way that inconveniences any portion of the assessment area; and
- The bank provides a relatively high level of community development services.

### **SCOPE OF EXAMINATION**

A full-scope review for the USVI consisting of the islands of St. Thomas, St. Croix, and St. John was conducted.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE UNITED STATES VIRGIN ISLANDS**

BPPR operated eight retail branches in the USVI, representing 5% of BPPR's total branch network. Two of the branches in the USVI are located in moderate-income geographies. BPPR is one of only four banks in the assessment area. As of June 30, 2014 BPPR's USVI branches held \$761 million in deposits. BPPR ranks 2<sup>nd</sup> in deposit market share (43.6%) slightly behind its principal competitor on the islands, Firstbank of Puerto Rico (43.8%). Other banks include the Bank of St. Croix, and Merchants Commercial Bank. The bank's loans within the USVI represent 1% of the total loans originated by BPPR during the review period.

## **PERFORMANCE CONTEXT**

The following demographic and economic information was obtained from publicly available sources that include the U.S. Department of Commerce's Census Bureau (2010), the USVI Bureau of Economic Research, and the USVI Public Housing Authority. Data from the American Community Survey from the U.S. Census for 2010 is only partially available therefore the ability to draw comparisons to demographic data is limited. Business data for 2013 from D&B is likewise partially available.

### *Demographic Characteristics*

The USVI consists of the main islands of St. Thomas, St. Croix, and St. John. According to the 2010 Census, the population of the USVI is approximately 106,405, down 2% from the 2000 census. The population in the USVI assessment area represents about 3% of the total population residing in BPPR's assessment areas. The USVI assessment area has 32 census tracts, of which 1 (3%) is low-income, 7 (22%) are moderate-income, 16 (50%) are middle-income, and 5 (16%) are upper-income geographies. Three census tracts (9%) have been designated as income unknown. There are 26,237 families in the USVI assessment area, of which approximately 2% reside in low-income geographies and 25% reside in moderate-income geographies.

### *Income Characteristics*

According to the 2010 census data, approximately 28% of families residing in the USVI assessment area are considered low-income and 12% are moderate-income. Of the total families residing in the assessment area, 18% live below the poverty level. Income levels in the USVI are generally higher than in Puerto Rico. The 2014 FFIEC-adjusted median family income for the USVI was \$41,800 on the island of St Thomas, \$31,200 for the island of St. Croix, and \$50,573 for the island of St. John.

### Housing Characteristics

According to the 2010 census, the USVI assessment area has 55,901 housing units, of which 37% (20,700) are owner-occupied, 40% (22,514) are rentals, and 23% (12,687) are vacant. Vacant housing units in non-LMI tracts are generally vacation homes that are not occupied year-round. Many rental units are apartments that are part of private homes. About 3,500 rental units are public housing. A breakdown of housing types by census tract income levels was not available.

As reported by the USVI Bureau of Economic Research, the housing and real estate market continues to be depressed. Comparison of the median family income to the average home price illustrates the challenges LMI individuals face in obtaining affordable housing. The average sales price of a home in the USVI is estimated to be about 29 times the income of a low-income family and 18 times the income of a moderate-income family.

### Labor, Employment and Economic Characteristics

According to the USVI Bureau of Economic Research unemployment in the USVI is high, 13.4% in 2013 and 13% in 2014 as the islands continue to experience a recession. The closing of the HOVENSA oil refinery on St Croix in 2012 also has had a major impact on employment, causing manufacturing employment to decline by 50% and total employment by 10%, a loss of 4,300 jobs. Tourism is a major industry sector accounting for roughly 18% of all employment while retail trade represents another 15%. The territorial government is also a major employer representing 25% of jobs. Until recently oil refining had been a major industry; now the most prevalent manufacturing employer on the islands is in the rum sector. A number of factors continue to restrain economic conditions, including uncertainty associated with anticipated growth of the U.S. economy (the major partner for tourism, trade and investment), government budget shortfalls, and the need for policies and programs to encourage economic growth and development.

Additional assessment area demographics can be found in the Exhibit 14 on the next page.

Exhibit 14								
Assessment Area Demographics								
U.S. Virgin Islands - 2013								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of		Families by Family Income (EST)	
	#	%	#	%	#	%	#	%
Low-income	1	3.1	590	2.2	278	5.8	7,218	27.5
Moderate-income	7	21.9	6,629	25.3	1,874	39.1	3,127	11.9
Middle-income	16	50.0	13,588	51.8	2,151	44.9	3,920	14.9
Upper-income	5	15.6	5,430	20.7	486	10.2	11,972	45.6
Unknown-income	3	9.4	0	0.0	0	0	0	0.0
<b>Total Assessment Area</b>	<b>32</b>	<b>100.0</b>	<b>26,237</b>	<b>100.0</b>	<b>4,789</b>	<b>18.3</b>	<b>26,237</b>	<b>100.0</b>
	Housing Units By Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	896	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Moderate-income	15,236	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Middle-income	28,356	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Upper-income	11,413	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Unknown-income	0	0	0.0	0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>55,901</b>	<b>20,700</b>	<b>0.0</b>	<b>37.0</b>	<b>22,514</b>	<b>40.3</b>	<b>12,687</b>	<b>22.7</b>
	Total Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Moderate-income	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Middle-income	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Upper-income	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Unknown-income	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>Total Assessment Area</b>	<b>2,130</b>	<b>100.0</b>	<b>1,426</b>	<b>100.0</b>	<b>256</b>	<b>100.0</b>	<b>448</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>66.9</b>		<b>12.0</b>		<b>21.0</b>	

Based on 2010 ACS Information and 2013 D&B Information. Number of Families estimated from number of families within ranges of income per ACS data.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE UNITED STATES VIRGIN ISLANDS

### LENDING TEST

BPPR's overall lending performance in the Non-MSA assessment area of St. Thomas, St. Croix, and St. John was good.

### Lending Activity

Lending activity reflected good responsiveness to assessment area credit needs in relation to the bank's capacity and performance context issues.

During the evaluation period, 782 HMDA-related and small business loans totaling approximately \$112 million were originated in the USVI assessment area. Lending activity in the USVI represents approximately 1% of the bank's total lending activity evaluated during this evaluation period.

### **Geographic Distribution**

The geographic distribution of HMDA-related and small business loans in the USVI reflected adequate performance in LMI geographies. As complete demographic data from the 2010 census is not available at the census tract level, the level of HMDA-related and small business lending in LMI tracts was compared to the percentage of LMI census tracts. Aggregate lending data was also not available for the USVI. Less than 1% of all HMDA-related loans and no small business loans were made in the one low-income tract while this one tract represents 3% of all census tracts. HMDA-related lending performance in moderate-income tracts was adequate as 12% of HMDA-related loans were in moderate-income tracts while 22% of census tracts were of moderate-income. Small business lending performance was excellent as 42% of all small business loans were in moderate-income tracts.

### **Distribution by Borrower Income and Revenue Size of Business**

BPPR's distribution of borrowers in the USVI assessment area reflects, given the product lines offered, overall good penetration among customers of different income levels and businesses of different sizes. Lending to small businesses was excellent, while overall lending to low- and moderate-income borrowers was adequate. It should be noted that the American Community Service only supplied family income data for ranges of income and the distribution of family income was estimated based on these ranges. Aggregate lending data was not available for the USVI.

#### *Low-income Borrowers*

BPPR's HMDA lending performance in lending to low-income borrowers was adequate overall when compared to the 28% of families in the USVI who are low-income and considering the performance context issues noted earlier in the performance context section for the USVI. In 2013, the bank made 1 refinance loan, 11 home improvement loans, and 9 home purchase loans to low-income borrowers. However, as previously noted, the average home sales price for the USVI was 29 times the income of a low-income family, making it difficult for lenders to extend home purchase, refinance, and home improvement loans to low-income borrowers in this area. Performance in 2012 and 2014 was comparable to 2013. There was no aggregate loan data available for comparison for the USVI.

*Moderate-income Borrowers*

BPPR’s HMDA lending performance to moderate-income borrowers was adequate overall when compared to the 12% of families in the MSA which are of moderate-income and considering the performance context issues noted earlier in the performance context section for the USVI. In 2013, the bank made 3 home purchase loans, 14 refinance loans and 29 home improvement loans to moderate-income borrowers. However, as noted previously, the average sales price for the USVI was 18 times the income of a moderate-income family, making it difficult for lenders to extend home purchase and home improvement loans to moderate-income borrowers. Performance in 2012 and 2014 was comparable to 2013.

*Small Business Lending*

BPPR provided a good level of lending to small business borrowers with GAR of \$1 million or less. Overall, the bank made 56% of its small business loans to these businesses, compared to the 67% of business establishments in the MSA with GAR of \$1 million or less. The bank made 30% of its small business loans in amounts of \$100,000 or less with an average loan size of \$131,000.

**Community Development Lending**

Banco Popular was a leader in community development lending performance and its lending was considered highly responsive to the credit needs of the USVI. As indicated in the table to the right, there were thirty-six community development loans specifically targeted to the USVI totaling approximately \$124 million, all of which were new loans originated in the current evaluation period. Within the assessment area, community development lending efforts in terms of dollar amount were directed at revitalization and stabilization.

<b>COMMUNITY DEVELOPMENT LENDING U.S. VIRGIN ISLANDS</b>		
<b>PURPOSE</b>	<b>#</b>	<b>\$(000s)</b>
Affordable Housing	1	20,898
Economic Development	3	9,350
Community Services	3	2,040
Revitalize and Stabilize	29	92,138
<b>TOTAL</b>	<b>36</b>	<b>124,426</b>

The following loans are highlighted:

- A \$10 million loan to the Virgin Islands Water and Power Authority to assist improving the water supply and help maintain a vital service to the residents.
- A \$6.7 million loan to purchase 125 automobiles for the Virgin Islands police. The Virgin Islands has several distressed census tracts and maintaining a strong police force is an activity that helps maintain businesses and residents.

- A \$28.7 million loan for improvements to the docking facilities to help maintain their ability to service cruise ships and handle three cruise ships simultaneously.

## **INVESTMENT TEST**

BPPR's performance under the investment test was adequate in the USVI. BPPR had an adequate level of qualified community development investments that exhibited adequate responsiveness to credit and community development needs. Qualified investments in the USVI totaled \$94,000 or less than 1% of the bank's total qualified investments. Of the total, all were grants and donations that were targeted to affordable housing and community service initiatives.

## **SERVICE TEST**

BPPR's performance under the service test in the USVI was excellent based on delivery systems that were accessible to all portions of the bank's assessment area, changes in branch locations that did not adversely impact the accessibility of delivery systems, and hours and services that were tailored to the convenience and needs of the assessment area. Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems, and a relatively high level of community development services.

### **Retail Services**

BPPR's delivery systems in the USVI were accessible to all portions of the assessment area, when compared with the percentage of households residing in LMI geographies. BPPR operated eight branches in this assessment area, of which two (25%) branches were located in moderate-income areas. In comparison, the assessment area has 40% of all households residing in low- and moderate-income areas in the assessment area.

Alternative delivery systems somewhat enhanced the bank's performance in this assessment area. BPPR used multiple alternative delivery systems, such as bank-by-mail, internet banking, mobile banking (including a mobile application), and 24-hour automated services, not specifically targeted to LMI individuals. BPPR maintained two off-site ATMs in the USVI, which were located in middle-income tracts.

Changes in branch locations did not adversely affect the accessibility of the bank's delivery systems. During the evaluation period, no branches were either opened or closed. BPPR's hours and services did not vary in a way that inconvenienced certain portions of the assessment area. Extended morning, late afternoon, weekend and holiday hours were available at four branches in this assessment area, one of which was in a moderate-income area.

### Community Development Services

BPPR provided a relatively high level of community development services in the USVI.

BPPR sponsored 63 financial education seminars, 5 mortgage education seminars and provided technical assistance event in the USVI. In addition, two BPPR officers served as directors, advisors, or committee members, providing financial management expertise and technical assistance to five non-profit and community based organizations.

<b>Community Development Services</b>	
Financial Literacy Seminars	63
Mortgage Education	5
Small Business Seminars	0
Technical Assistance	1
<b>Total</b>	<b>69</b>

**CRA APPENDIX A**  
**SCOPE OF EXAMINATION**

<b>BANCO POPULAR DE PUERTO RICO</b>			
<b>TIME PERIOD REVIEWED</b>	<b>Lending Test: January 1, 2012 – December 31, 1/2014</b>  <b>CD Loans/Investments: January 1, 2012 – March 31, 2015</b>		
<b>FINANCIAL INSTITUTION</b>  Banco Popular de Puerto Rico, 209 Munoz Rivera Avenue San Juan, PR		<b>PRODUCTS REVIEWED</b>  <ul style="list-style-type: none"> <li>• Home purchase</li> <li>• Refinancings</li> <li>• Home improvement</li> <li>• Small business</li> <li>• Community development loans</li> </ul>	
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONS HIP</b>		<b>PRODUCTS REVIEWED</b>
Popular Mortgage Inc	Bank Subsidiary		<ul style="list-style-type: none"> <li>• Mortgage Originations</li> </ul>
Popular Auto, Inc.	Bank Subsidiary		<ul style="list-style-type: none"> <li>• Home Improvement</li> </ul>

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
<b><u>Puerto Rico</u></b>			
<b>MSA 41980 (San Juan-Caguas-Guaynabo, PR)</b>	Full Scope	None	
<b>MSA 10380 (Aguadilla-Isabela-San Sebastian, PR)</b>	Full Scope	None	
<b>MSA 38660 (Ponce, PR)</b>	Full Scope	None	
MSA 32420 (Mayaguez, PR)	Limited Scope	None	
MSA 41900 (San German-Cabo Rojo, PR)	Limited Scope	None	
MSA 25020 (Guayama, PR)	Limited Scope	None	
MSA 11640 (Arecibo, PR)	Limited Scope	None	
Non-MSA A (Municipios of Adjuntas, Jayuya, Utuado, Las Marias, and Maricao)	Limited Scope	None	
Non-MSA B (Municipios of Coamo, Santa Isabel, and Salinas)	Limited Scope	None	
Non-MSA C (Municipios of Vieques and Culebra)	Limited Scope	None	
<b>U.S. Virgin Islands</b>			
<b>Non-MSA Islands of St. Thomas, St. Croix, and St. John</b>	Full Scope	None	

**APPENDIX B**

**Summary of Ratings**

<b>STATE OR MSA</b>	<b>LENDING TEST RATING</b>	<b>INVESTMENT TEST RATING</b>	<b>SERVICE TEST RATING</b>	<b>OVERALL RATING</b>
<b>Puerto Rico</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>Outstanding</b>
<b>USVI</b>	<b>High Satisfactory</b>	<b>Low Satisfactory</b>	<b>Outstanding</b>	<b>Satisfactory</b>

## APPENDIX C

### GLOSSARY

**Census tract:** 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 statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** All agencies have adopted the following language. Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have GAR of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies; or loans, investments or services that (i) Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301c of the Housing and Economic Recovery Act of 2008 ("HERA"), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program ("NSP"); (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; (iii) Benefit low-, moderate- and middle-income individuals and geographies in the bank's assessment area(s) or geographies outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-

- a. Rates of poverty, unemployment, and population loss; or
- b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**Community Development Financial Institution (“CDFI”):** A CDFI is an organization that has been certified by the U.S. Treasury as a provider of loans and services that assist specially funded institutions that revitalize LMI areas and assist LMI persons.

**Family:** A family is a group of two people or more related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

**Full Scope:** Performance is analyzed considering performance context, quantitative factors and qualitative factors.

**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 income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

**Household:** A household consists of all persons who occupy a housing unit. Persons not living in households are classified as living in group quarters.

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

**Metropolitan Area (“MA”):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

**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.

**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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

**Wholesale bank:** A bank that is not in the business of extending home mortgage, small business, small farm or consumer loans to retail customers, and for which a designation as a wholesale bank is in effect, in accordance with the CRA regulation.

**APPENDIX D**  
**2014 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41980

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
	<b>Home Purchase</b>									
Low	62	1.8%	1.1%	3.0%	2.3%	8	0.2%	0.1%	0.8%	0.2%
Moderate	582	16.5%	13.6%	18.8%	15.5%	124	3.5%	1.8%	8.2%	4.3%
Middle	1,167	33.1%	26.0%	37.1%	31.9%	278	7.9%	5.4%	15.2%	10.5%
Upper	1,719	48.7%	59.2%	40.9%	50.2%	1,438	40.7%	51.5%	58.9%	69.8%
Unknown	1	0.0%	0.0%	0.2%	0.2%	1,683	47.7%	41.2%	17.0%	15.2%
<b>Total</b>	<b>3,531</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,531</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	57	2.0%	1.3%	2.3%	1.7%	13	0.5%	0.2%	1.9%	1.1%
Moderate	411	14.4%	10.9%	15.8%	12.1%	87	3.0%	1.8%	6.3%	3.8%
Middle	1,004	35.1%	27.7%	36.8%	31.6%	228	8.0%	5.5%	12.3%	9.1%
Upper	1,389	48.5%	60.1%	45.0%	54.5%	1,212	42.3%	57.1%	51.1%	61.1%
Unknown	1	0.0%	0.0%	0.1%	0.0%	1,322	46.2%	35.4%	28.4%	25.0%
<b>Total</b>	<b>2,862</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,862</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	119	3.4%	2.6%	2.9%	1.9%	346	9.8%	3.3%	9.1%	2.5%
Moderate	1,153	32.5%	24.9%	28.1%	19.2%	850	24.0%	10.7%	21.7%	9.5%
Middle	1,381	39.0%	35.1%	39.5%	34.7%	783	22.1%	15.1%	21.9%	15.1%
Upper	890	25.1%	37.4%	29.5%	44.2%	1,462	41.2%	57.3%	45.6%	67.2%
Unknown	2	0.1%	0.1%	0.0%	0.0%	104	2.9%	13.6%	1.7%	5.6%
<b>Total</b>	<b>3,545</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,545</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	7.9%	8.1%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	21.1%	13.5%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	15.8%	13.5%	0	0.0%	0.0%	0.0%	0.0%
Upper	2	100.0%	100.0%	55.3%	64.8%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>HMDA Totals</b>									
Low	238	2.4%	1.3%	2.7%	2.0%	367	3.7%	0.4%	2.9%	0.7%
Moderate	2,146	21.6%	13.3%	19.5%	14.1%	1,061	10.7%	2.5%	10.1%	4.3%
Middle	3,552	35.7%	27.3%	37.4%	31.8%	1,289	13.0%	6.2%	15.3%	10.1%
Upper	4,000	40.2%	58.1%	40.3%	51.9%	4,112	41.4%	54.1%	53.0%	65.6%
Unknown	4	0.0%	0.0%	0.1%	0.1%	3,111	31.3%	37.0%	18.7%	19.3%
<b>Total</b>	<b>9,940</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,940</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)	#	Bank %	% \$(000s)	Aggregate %	% \$(000s)
Low	332	4.9%	4.7%	4.5%	4.5%					
Moderate	1,384	20.4%	18.0%	17.7%	16.6%					
Middle	1,808	26.7%	23.9%	24.3%	24.1%					
Upper	3,186	47.1%	52.7%	48.0%	53.5%					
Unknown	60	0.9%	0.7%	0.8%	0.8%					
Tract Unknown	0	0.0%	0.0%	4.7%	0.5%					
<b>Total</b>	<b>6,770</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
	<b>By Revenue</b>									
\$1 Million or Less	4,801	70.9%	45.5%	65.4%	44.9%					
	<b>By Loan Size</b>									
\$100,000 or less	5,585	82.5%	33.8%	84.0%	29.6%					
\$100,001-\$250,000	707	10.4%	22.8%	9.0%	21.9%					
\$250,001-\$1 Million	478	7.1%	43.4%	7.0%	48.5%					
<b>Total</b>	<b>6,770</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2014 Aggregate Comparison Loan Distribution Table**

Assessment Area/Group: MSA 10380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	2	0.7%	0.8%	1.8%	1.5%	0	0.0%	0.0%	0.1%	0.0%
Moderate	21	7.5%	6.7%	8.1%	6.7%	2	0.7%	0.4%	2.1%	0.6%
Middle	172	61.4%	63.6%	60.9%	60.2%	21	7.5%	4.8%	8.9%	5.0%
Upper	85	30.4%	28.9%	29.2%	31.6%	198	70.7%	77.3%	80.7%	87.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	59	21.1%	17.5%	8.1%	7.1%
<b>Total</b>	<b>280</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>280</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	2	1.0%	0.7%	1.3%	1.3%	0	0.0%	0.0%	0.2%	0.2%
Moderate	12	5.7%	5.4%	5.8%	4.7%	1	0.5%	0.2%	2.0%	1.1%
Middle	119	56.9%	59.0%	64.2%	62.3%	11	5.3%	3.7%	8.2%	5.5%
Upper	76	36.4%	34.9%	28.6%	31.6%	146	69.9%	77.1%	70.2%	76.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	51	24.4%	19.0%	19.4%	16.3%
<b>Total</b>	<b>209</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>209</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	2	0.4%	0.2%	0.7%	1.2%	9	2.0%	0.6%	2.7%	0.8%
Moderate	45	10.0%	13.5%	11.0%	12.0%	61	13.5%	5.5%	12.2%	5.5%
Middle	304	67.3%	66.0%	66.3%	65.7%	110	24.3%	12.2%	21.6%	11.7%
Upper	101	22.3%	20.4%	21.9%	21.1%	267	59.1%	75.7%	62.7%	78.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	1.1%	6.1%	0.7%	4.0%
<b>Total</b>	<b>452</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>452</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	6	0.6%	0.7%	1.3%	1.4%	9	1.0%	0.1%	0.8%	0.1%
Moderate	78	8.3%	7.2%	8.0%	6.0%	64	6.8%	1.0%	4.8%	1.2%
Middle	595	63.2%	62.4%	63.7%	61.6%	142	15.1%	5.4%	12.1%	5.7%
Upper	262	27.8%	29.8%	27.0%	31.0%	611	64.9%	77.0%	71.4%	81.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	115	12.2%	16.5%	10.8%	11.5%
<b>Total</b>	<b>941</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>941</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	34	4.1%	5.5%	4.3%	4.7%					
Moderate	140	16.8%	19.0%	14.5%	15.6%					
Middle	474	57.0%	57.1%	54.6%	61.2%					
Upper	183	22.0%	18.4%	23.4%	18.2%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	3.3%	0.4%					
<b>Total</b>	<b>831</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or less	648	78.0%	60.7%	73.4%	59.8%					
<b>By Loan Size</b>										
\$100,000 or less	749	90.1%	47.9%	88.5%	41.8%					
\$100,001-\$250,000	50	6.0%	20.0%	7.1%	22.4%					
\$250,001-\$1 Million	32	3.9%	32.1%	4.4%	35.8%					
<b>Total</b>	<b>831</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2014 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 38660

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	2	0.5%	0.4%	1.5%	1.2%	0	0.0%	0.0%	0.3%	0.1%
Moderate	19	4.5%	3.7%	9.0%	7.3%	7	1.7%	0.9%	2.7%	1.2%
Middle	131	31.0%	29.5%	41.4%	40.0%	45	10.6%	7.8%	15.1%	10.4%
Upper	271	64.1%	66.4%	48.0%	51.5%	171	40.4%	46.8%	63.3%	71.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	200	47.3%	44.5%	18.6%	16.4%
<b>Total</b>	<b>423</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>423</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.7%	0.5%	0	0.0%	0.0%	0.5%	0.3%
Moderate	31	11.7%	11.2%	14.6%	13.5%	5	1.9%	1.3%	3.4%	2.0%
Middle	102	38.6%	37.4%	32.8%	31.3%	20	7.6%	5.7%	8.7%	6.7%
Upper	131	49.6%	51.4%	51.9%	54.8%	126	47.7%	52.5%	53.8%	60.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	113	42.8%	40.5%	33.6%	30.7%
<b>Total</b>	<b>264</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>264</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	3	0.8%	0.5%	1.4%	0.8%	8	2.0%	0.6%	2.7%	0.9%
Moderate	87	22.1%	18.2%	21.3%	16.7%	76	19.3%	9.1%	15.7%	9.3%
Middle	172	43.7%	43.9%	41.4%	39.8%	106	26.9%	15.8%	24.2%	14.3%
Upper	132	33.5%	37.5%	35.9%	42.7%	197	50.0%	66.1%	56.3%	71.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	1.8%	8.5%	1.1%	4.0%
<b>Total</b>	<b>394</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>394</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	5	0.5%	0.3%	1.2%	0.8%	8	0.7%	0.0%	0.9%	0.2%
Moderate	137	12.7%	6.9%	14.0%	10.3%	88	8.1%	1.6%	6.0%	2.0%
Middle	406	37.5%	36.5%	38.1%	37.3%	171	15.8%	7.4%	14.7%	8.9%
Upper	534	49.4%	56.3%	46.7%	51.6%	494	45.7%	47.7%	58.0%	66.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	321	29.7%	43.2%	20.4%	22.9%
<b>Total</b>	<b>1,082</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,082</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)	#	Bank %	Aggregate % \$(000s)	Bank %	Aggregate % \$(000s)
Low	17	2.5%	2.3%	2.3%	2.3%	8	2.7%	3.4%	3.4%	3.4%
Moderate	124	18.0%	17.0%	17.0%	17.0%	88	18.5%	15.5%	15.5%	15.5%
Middle	233	33.8%	31.2%	31.2%	31.2%	171	32.0%	33.6%	33.6%	33.6%
Upper	315	45.7%	49.5%	49.5%	49.5%	494	43.6%	47.0%	47.0%	47.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>689</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>689</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	514	74.6%	50.6%	67.5%	52.8%					
<b>By Loan Size</b>										
\$100,000 or less	609	88.4%	44.1%	86.8%	39.5%					
\$100,001-\$250,000	49	7.1%	19.5%	8.8%	25.2%					
\$250,001-\$1 Million	31	4.5%	36.3%	4.4%	35.3%					
<b>Total</b>	<b>689</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2014 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 32420

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	4	6.6%	3.9%	5.7%	3.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	1.6%	0.8%	5.7%	4.4%	9	14.8%	9.2%	12.3%	7.7%
Middle	42	68.9%	65.9%	58.8%	61.5%	10	16.4%	11.3%	17.1%	12.5%
Upper	14	23.0%	29.5%	29.9%	30.4%	38	62.3%	74.2%	66.4%	76.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	6.6%	5.3%	4.3%	3.1%
<b>Total</b>	<b>61</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>61</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	3.8%	2.3%	0	0.0%	0.0%	0.7%	0.5%
Moderate	1	1.2%	1.6%	2.8%	1.8%	1	1.2%	0.6%	5.6%	2.9%
Middle	41	50.0%	49.9%	51.7%	50.5%	9	11.0%	8.5%	9.8%	6.5%
Upper	40	48.8%	48.4%	41.6%	45.3%	42	51.2%	64.7%	59.8%	72.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	30	36.6%	26.1%	24.1%	18.0%
<b>Total</b>	<b>82</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>82</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	10	6.3%	6.7%	6.1%	4.4%	6	3.8%	1.5%	4.8%	2.0%
Moderate	15	9.5%	5.3%	7.9%	4.5%	39	24.7%	12.8%	22.8%	12.8%
Middle	76	48.1%	54.8%	50.4%	49.6%	39	24.7%	13.0%	22.8%	10.8%
Upper	57	36.1%	33.3%	35.5%	41.5%	73	46.2%	63.0%	49.1%	68.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.6%	9.8%	0.4%	5.7%
<b>Total</b>	<b>158</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>158</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	14	4.7%	2.4%	5.1%	3.0%	6	2.0%	0.2%	1.8%	0.4%
Moderate	17	5.6%	1.9%	5.2%	3.1%	49	16.3%	5.5%	13.0%	5.6%
Middle	159	52.8%	56.3%	53.4%	54.7%	58	19.3%	10.2%	16.0%	9.2%
Upper	111	36.9%	39.4%	36.3%	39.2%	153	50.8%	67.8%	58.3%	73.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	35	11.6%	16.3%	10.9%	11.2%
<b>Total</b>	<b>301</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>301</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	124	28.6%	19.1%		27.8%	20.3%				
Moderate	60	13.9%	12.1%		13.7%	11.4%				
Middle	150	34.6%	40.7%		31.3%	39.3%				
Upper	99	22.9%	28.1%		25.6%	28.8%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		1.5%	0.1%				
<b>Total</b>	<b>433</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	334	77.1%	49.8%		69.5%	49.6%				
<b>By Loan Size</b>										
\$100,000 or less	396	91.5%	48.3%		91.0%	44.5%				
\$100,001-\$250,000	17	3.9%	10.6%		4.4%	13.1%				
\$250,001-\$1 Million	20	4.6%	41.2%		4.6%	42.4%				
<b>Total</b>	<b>433</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

### 2014 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: MSA 41900

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	13	7.6%	7.0%	8.1%	8.0%	6	3.5%	2.1%	3.5%	1.9%
Middle	99	57.9%	58.5%	61.2%	61.6%	13	7.6%	4.7%	14.2%	9.7%
Upper	59	34.5%	34.5%	30.5%	30.2%	126	73.7%	80.2%	74.7%	81.4%
Unknown	0	0.0%	0.0%	0.2%	0.2%	26	15.2%	13.0%	7.7%	6.9%
<b>Total</b>	<b>171</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>171</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	0.7%	0.5%	0.9%	0.5%
Moderate	10	7.0%	7.5%	11.9%	11.5%	3	2.1%	1.2%	4.4%	3.2%
Middle	89	62.7%	62.1%	59.4%	60.5%	13	9.2%	5.9%	11.6%	8.8%
Upper	43	30.3%	30.4%	28.7%	28.1%	80	56.3%	66.2%	51.7%	61.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	45	31.7%	26.2%	31.4%	26.4%
<b>Total</b>	<b>142</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>142</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	12	3.9%	1.1%	4.9%	1.2%
Moderate	36	11.7%	14.4%	10.8%	9.7%	68	22.1%	9.0%	21.2%	10.4%
Middle	207	67.4%	61.9%	65.5%	65.1%	83	27.0%	16.9%	25.4%	15.4%
Upper	64	20.8%	23.7%	23.6%	25.1%	138	45.0%	58.8%	47.0%	64.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	2.0%	14.2%	1.5%	8.4%
<b>Total</b>	<b>307</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>307</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	13	2.1%	0.3%	1.8%	0.3%
Moderate	59	9.5%	8.0%	10.5%	9.8%	77	12.4%	2.6%	8.9%	3.1%
Middle	395	63.7%	60.2%	61.6%	61.2%	109	17.6%	6.5%	16.3%	9.7%
Upper	166	26.8%	31.8%	27.8%	28.9%	344	55.5%	72.6%	57.3%	70.4%
Unknown	0	0.0%	0.0%	0.1%	0.1%	77	12.4%	18.0%	15.7%	16.5%
<b>Total</b>	<b>620</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>620</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate				Aggregate	
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Moderate	19	5.6%	3.9%	6.1%	4.6%	6.1%	4.6%	6.1%	4.6%	
Middle	214	63.3%	73.0%	64.2%	73.5%	64.2%	73.5%	64.2%	73.5%	
Upper	105	31.1%	23.1%	28.2%	21.8%	28.2%	21.8%	28.2%	21.8%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
Tract Unknown	0	0.0%	0.0%	1.5%	0.1%	1.5%	0.1%	1.5%	0.1%	
<b>Total</b>	<b>338</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
<b>By Revenue</b>										
\$1 Million or Less	264	78.1%	56.8%	72.5%	55.9%	72.5%	55.9%	72.5%	55.9%	
<b>By Loan Size</b>										
\$100,000 or less	294	87.0%	38.6%	86.9%	37.1%	86.9%	37.1%	86.9%	37.1%	
\$100,001-\$250,000	28	8.3%	25.0%	8.1%	24.5%	8.1%	24.5%	8.1%	24.5%	
\$250,001-\$1 Million	16	4.7%	36.4%	5.1%	38.5%	5.1%	38.5%	5.1%	38.5%	
<b>Total</b>	<b>338</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations and Purchases

**2014 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 25020

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	13	16.0%	17.2%	6.4%	7.7%	1	1.2%	0.8%	3.2%	1.7%
Middle	56	69.1%	65.5%	80.3%	77.1%	2	2.5%	2.0%	20.7%	16.4%
Upper	12	14.8%	17.3%	13.4%	15.2%	25	30.9%	33.8%	56.7%	61.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	53	65.4%	63.4%	19.4%	20.1%
<b>Total</b>	<b>81</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>81</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.2%	0.2%
Moderate	4	5.0%	4.7%	8.7%	8.3%	0	0.0%	0.0%	4.5%	3.2%
Middle	61	76.3%	78.1%	73.6%	71.8%	8	10.0%	7.4%	7.8%	6.3%
Upper	15	18.8%	17.1%	17.7%	19.9%	21	26.3%	32.3%	41.8%	47.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	51	63.8%	60.3%	45.6%	43.2%
<b>Total</b>	<b>80</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>80</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	3	1.6%	0.5%	1.7%	0.4%
Moderate	6	3.3%	1.3%	2.5%	0.8%	26	14.2%	4.1%	12.2%	3.5%
Middle	158	86.3%	89.6%	85.7%	88.4%	58	31.7%	23.2%	28.2%	17.5%
Upper	19	10.4%	9.1%	11.8%	10.9%	94	51.4%	66.9%	57.1%	75.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.1%	5.2%	0.8%	3.1%
<b>Total</b>	<b>183</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>183</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	3	0.9%	0.1%	0.5%	0.1%
Moderate	23	6.7%	9.7%	6.5%	7.5%	27	7.8%	1.1%	5.9%	2.6%
Middle	275	79.9%	74.4%	78.6%	75.2%	68	19.8%	7.7%	16.7%	11.3%
Upper	46	13.4%	15.9%	14.9%	17.3%	140	40.7%	38.9%	50.2%	55.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	106	30.8%	52.2%	26.7%	30.8%
<b>Total</b>	<b>344</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>344</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		0.0%	0.0%				
Moderate	5	3.2%	1.2%		2.9%	0.8%				
Middle	120	77.9%	81.9%		78.0%	81.5%				
Upper	29	18.8%	16.9%		17.2%	17.6%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		1.9%	0.1%				
<b>Total</b>	<b>154</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	121	78.6%	53.4%		76.1%	61.6%				
<b>By Loan Size</b>										
\$100,000 or less	139	90.3%	46.7%		87.1%	36.2%				
\$100,001-\$250,000	11	7.1%	23.8%		7.7%	20.3%				
\$250,001-\$1 Million	4	2.6%	29.6%		5.3%	43.5%				
<b>Total</b>	<b>154</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2014 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 11640

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	Aggregate %	Bank %	Aggregate %	#	Bank %	Aggregate %	Bank %	Aggregate %
<b>Home Purchase</b>										
Low	9	5.2%	4.6%	5.4%	4.2%	1	0.6%	0.3%	0.8%	0.2%
Moderate	4	2.3%	2.0%	3.9%	3.3%	1	0.6%	0.2%	3.7%	1.6%
Middle	122	70.1%	71.2%	62.0%	59.2%	10	5.7%	4.1%	16.8%	11.1%
Upper	39	22.4%	22.3%	28.7%	33.4%	63	36.2%	40.2%	63.3%	72.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	99	56.9%	55.3%	15.4%	14.8%
<b>Total</b>	<b>174</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>174</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	6	3.6%	3.8%	2.8%	2.5%	1	0.6%	1.0%	0.6%	0.4%
Moderate	7	4.2%	2.9%	4.7%	4.4%	5	3.0%	2.1%	6.0%	3.4%
Middle	126	75.0%	76.0%	69.9%	70.5%	8	4.8%	3.9%	8.7%	6.3%
Upper	29	17.3%	17.3%	22.7%	22.6%	94	56.0%	62.4%	57.3%	64.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	60	35.7%	30.5%	27.5%	25.3%
<b>Total</b>	<b>168</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>168</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	8	2.7%	1.7%	2.8%	1.5%	4	1.3%	0.3%	2.1%	0.4%
Moderate	7	2.3%	2.5%	3.5%	7.8%	59	19.7%	7.2%	18.6%	7.4%
Middle	229	76.6%	81.1%	71.7%	73.3%	81	27.1%	13.1%	24.4%	11.1%
Upper	55	18.4%	14.7%	22.0%	17.4%	153	51.2%	76.4%	54.5%	79.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	0.7%	2.9%	0.5%	1.7%
<b>Total</b>	<b>299</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>299</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	23	3.6%	3.9%	3.8%	3.3%	6	0.9%	0.6%	1.0%	0.3%
Moderate	18	2.8%	2.4%	4.1%	4.0%	65	10.1%	2.0%	8.0%	2.7%
Middle	477	74.4%	74.5%	67.2%	64.8%	99	15.4%	5.3%	15.6%	9.1%
Upper	123	19.2%	19.2%	24.9%	27.9%	310	48.4%	54.2%	59.0%	69.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	161	25.1%	38.0%	16.4%	18.3%
<b>Total</b>	<b>641</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>641</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	35	7.6%	7.5%	6.9%	6.2%					
Moderate	64	13.9%	17.5%	10.9%	13.3%					
Middle	287	62.5%	59.4%	61.8%	61.8%					
Upper	73	15.9%	15.6%	15.2%	18.2%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	5.3%	0.5%					
<b>Total</b>	<b>459</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	312	68.0%	43.8%	65.5%	49.9%					
<b>By Loan Size</b>										
\$100,000 or less	391	85.2%	37.5%	86.3%	37.6%					
\$100,001-\$250,000	49	10.7%	29.6%	9.8%	29.3%					
\$250,001-\$1 Million	19	4.1%	32.9%	3.9%	33.1%					
<b>Total</b>	<b>459</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2014 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Non MSA A

Income Categories	HMDA										
	By Tract Income					By Borrower Income					
	Bank		Aggregate			Bank		Aggregate			
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)	
	<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
Moderate	3	18.8%	26.4%	16.1%	21.1%	0	0.0%	0.0%	1.8%	0.7%	
Middle	10	62.5%	62.8%	60.7%	57.8%	1	6.3%	4.4%	8.9%	7.6%	
Upper	3	18.8%	10.8%	23.2%	21.0%	9	56.3%	59.7%	76.8%	79.2%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	6	37.5%	35.9%	12.5%	12.4%	
<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.9%	0.9%	
Moderate	1	10.0%	11.8%	16.5%	19.7%	0	0.0%	0.0%	5.8%	3.3%	
Middle	9	90.0%	88.2%	66.0%	62.6%	2	20.0%	16.7%	10.7%	7.6%	
Upper	0	0.0%	0.0%	17.5%	17.7%	6	60.0%	68.8%	62.1%	73.2%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	20.0%	14.4%	19.4%	15.0%	
<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.8%	0.2%	
Moderate	15	40.5%	23.1%	36.8%	26.2%	7	18.9%	11.0%	12.3%	3.9%	
Middle	18	48.6%	61.2%	52.6%	67.7%	10	27.0%	20.4%	24.6%	8.8%	
Upper	4	10.8%	15.7%	10.5%	6.1%	20	54.1%	68.7%	61.4%	87.2%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
<i>Total</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>37</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	<i>0.0%</i>	
	<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.4%	0.5%	
Moderate	19	30.2%	22.1%	21.8%	20.9%	7	11.1%	2.3%	6.5%	2.5%	
Middle	37	58.7%	68.8%	61.1%	61.5%	13	20.6%	10.8%	13.9%	7.8%	
Upper	7	11.1%	9.2%	17.1%	17.6%	35	55.6%	63.9%	65.7%	76.8%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	12.7%	23.0%	12.5%	12.5%	
<i>Total</i>	<i>63</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>63</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
	<b>SMALL BUSINESS</b>										
	<b>By Tract Income</b>					<b>By Revenue</b>					
		<b>Bank</b>		<b>Aggregate</b>				<b>Bank</b>		<b>Aggregate</b>	
	<b>#</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>#</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
Moderate	16	15.1%	13.3%	12.7%	11.7%	16	15.1%	13.3%	12.7%	11.7%	
Middle	72	67.9%	69.5%	66.7%	70.3%	72	67.9%	69.5%	66.7%	70.3%	
Upper	18	17.0%	17.2%	16.7%	17.6%	18	17.0%	17.2%	16.7%	17.6%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
Tract Unknown	0	0.0%	0.0%	4.0%	0.4%	0	0.0%	0.0%	4.0%	0.4%	
<i>Total</i>	<i>106</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>106</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	
		<b>By Loan Size</b>					<b>By Loan Size</b>				
\$1 Million or Less	88	83.0%	69.3%	75.4%	67.5%	88	83.0%	69.3%	75.4%	67.5%	
\$100,000 or less	101	95.3%	69.3%	95.2%	68.1%	101	95.3%	69.3%	95.2%	68.1%	
\$100,001-\$250,000	4	3.8%	18.3%	4.0%	20.9%	4	3.8%	18.3%	4.0%	20.9%	
\$250,001-\$1 Million	1	0.9%	12.4%	0.8%	10.9%	1	0.9%	12.4%	0.8%	10.9%	
<i>Total</i>	<i>106</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>106</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100.0%</i>	

Originations and Purchases

**2014 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Non MSA B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.5%	0.1%
Moderate	1	0.9%	0.8%	5.7%	5.0%	0	0.0%	0.0%	2.7%	1.3%
Middle	64	58.7%	58.2%	57.1%	54.2%	6	5.5%	4.4%	15.1%	11.7%
Upper	44	40.4%	41.1%	37.2%	40.8%	38	34.9%	37.2%	62.3%	68.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	65	59.6%	58.5%	19.4%	18.6%
<b>Total</b>	<b>109</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>109</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.5%	0.2%
Moderate	0	0.0%	0.0%	4.7%	4.9%	0	0.0%	0.0%	1.2%	0.5%
Middle	42	51.9%	52.5%	54.4%	51.8%	1	1.2%	1.0%	5.8%	4.8%
Upper	39	48.1%	47.5%	40.9%	43.4%	49	60.5%	60.7%	52.6%	58.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	31	38.3%	38.3%	40.0%	35.9%
<b>Total</b>	<b>81</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>81</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	0.8%	0.3%	0.9%	0.2%
Moderate	6	4.7%	4.0%	4.1%	4.3%	12	9.3%	2.5%	9.9%	2.3%
Middle	88	68.2%	56.3%	62.2%	49.9%	29	22.5%	15.4%	20.7%	13.6%
Upper	35	27.1%	39.7%	33.8%	45.8%	86	66.7%	77.4%	68.0%	82.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.8%	4.3%	0.5%	1.8%
<b>Total</b>	<b>129</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>129</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	0.3%	0.0%	0.6%	0.2%
Moderate	7	2.2%	0.8%	4.9%	4.9%	12	3.8%	0.3%	3.6%	1.0%
Middle	194	60.8%	55.8%	57.1%	52.8%	36	11.3%	4.2%	12.5%	8.7%
Upper	118	37.0%	43.4%	38.0%	42.3%	173	54.2%	50.3%	59.5%	64.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	97	30.4%	45.2%	23.7%	25.3%
<b>Total</b>	<b>319</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>319</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		<b>Bank</b>			<b>Aggregate</b>					
	<b>#</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	32	22.4%	26.4%	21.8%	34.3%	21.8%	34.3%	21.8%	34.3%	21.8%
Middle	58	40.6%	31.1%	40.8%	24.8%	40.8%	24.8%	40.8%	24.8%	40.8%
Upper	53	37.1%	42.5%	35.5%	40.7%	35.5%	40.7%	35.5%	40.7%	35.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	1.9%	0.2%	1.9%	0.2%	1.9%	0.2%	1.9%
<b>Total</b>	<b>143</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	109	76.2%	55.8%	73.5%	51.2%	73.5%	51.2%	73.5%	51.2%	51.2%
<b>By Loan Size</b>										
\$100,000 or less	133	93.0%	52.5%	91.0%	39.4%	91.0%	39.4%	91.0%	39.4%	39.4%
\$100,001-\$250,000	4	2.8%	10.4%	2.8%	8.5%	2.8%	8.5%	2.8%	8.5%	8.5%
\$250,001-\$1 Million	6	4.2%	37.1%	6.2%	52.1%	6.2%	52.1%	6.2%	52.1%	52.1%
<b>Total</b>	<b>143</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

### 2014 Aggregate Comparison Loan Distribution Table

Assessment Area/Group: Non MSA C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	5	50.0%	38.8%	26.3%	23.3%	1	10.0%	4.0%	5.3%	2.4%
Upper	5	50.0%	61.2%	63.2%	70.4%	8	80.0%	92.0%	84.2%	91.3%
Unknown	0	0.0%	0.0%	10.5%	6.3%	1	10.0%	3.9%	10.5%	6.3%
<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	16.7%	2.8%	5.9%	1.4%	0	0.0%	0.0%	5.9%	3.0%
Upper	5	83.3%	97.2%	94.1%	98.6%	6	100.0%	100.0%	76.5%	82.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	17.6%	15.0%
<b>Total</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	8.0%	3.5%	5.9%	1.8%
Middle	10	40.0%	24.8%	32.4%	18.3%	8	32.0%	11.7%	29.4%	7.3%
Upper	15	60.0%	75.2%	67.6%	81.7%	15	60.0%	84.8%	64.7%	90.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	4.9%	0.4%	2.9%	0.2%
Middle	16	39.0%	23.4%	24.3%	13.4%	9	22.0%	3.2%	17.1%	3.2%
Upper	25	61.0%	76.6%	72.9%	83.7%	29	70.7%	94.4%	72.9%	87.2%
Unknown	0	0.0%	0.0%	2.9%	2.9%	1	2.4%	2.0%	7.1%	9.4%
<b>Total</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>Bank</b>		<b>Aggregate</b>			<b>Bank</b>		<b>Aggregate</b>		
	<b>#</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>#</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	17	47.2%	47.2%	61.2%	34.4%	17	47.2%	47.2%	47.2%	47.2%
Upper	19	52.8%	52.8%	38.8%	52.5%	19	52.8%	51.5%	51.5%	51.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	27	75.0%	75.0%	50.3%	59.0%	27	75.0%	59.5%	59.5%	59.5%
<b>By Loan Size</b>										
\$100,000 or less	30	83.3%	83.3%	38.3%	88.5%	30	83.3%	33.2%	33.2%	33.2%
\$100,001-\$250,000	4	11.1%	11.1%	28.8%	6.6%	4	11.1%	21.9%	21.9%	21.9%
\$250,001-\$1 Million	2	5.6%	5.6%	33.0%	4.9%	2	5.6%	44.9%	44.9%	44.9%
<b>Total</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 32420

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	10	5.2%	2.9%	6.1%	3.8%	1	0.5%	0.2%	0.3%	0.1%
Moderate	5	2.6%	1.6%	5.0%	4.8%	11	5.7%	4.1%	9.9%	6.3%
Middle	106	55.2%	53.8%	54.2%	51.8%	10	5.2%	4.5%	8.7%	7.4%
Upper	71	37.0%	41.7%	34.4%	39.6%	71	37.0%	49.7%	49.0%	61.6%
Unknown	0	0.0%	0.0%	0.3%	0.1%	99	51.6%	41.6%	32.1%	24.7%
<b>Total</b>	<b>192</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>192</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	4	2.5%	4.3%	3.9%	3.7%	0	0.0%	0.0%	1.1%	0.5%
Moderate	7	4.5%	2.3%	5.6%	4.3%	2	1.3%	0.4%	3.5%	2.2%
Middle	75	47.8%	46.2%	49.4%	46.0%	7	4.5%	3.5%	8.3%	6.0%
Upper	71	45.2%	47.2%	41.2%	45.9%	83	52.9%	64.3%	51.0%	61.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	65	41.4%	31.8%	36.0%	30.0%
<b>Total</b>	<b>157</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>157</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	2	1.9%	0.4%	3.3%	1.3%	4	3.9%	0.9%	4.0%	1.2%
Moderate	9	8.7%	4.6%	11.3%	7.8%	26	25.2%	8.3%	21.9%	6.0%
Middle	58	56.3%	56.3%	54.3%	50.2%	16	15.5%	7.8%	19.9%	12.5%
Upper	34	33.0%	38.8%	31.1%	40.7%	52	50.5%	56.8%	51.0%	65.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	5	4.9%	26.3%	3.3%	14.6%
<b>Total</b>	<b>103</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>103</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
	<b>HMDA Totals</b>									
Low	16	3.5%	3.4%	4.5%	3.7%	5	1.1%	0.1%	1.3%	0.4%
Moderate	21	4.6%	2.1%	6.2%	4.6%	39	8.6%	2.6%	8.3%	3.8%
Middle	239	52.9%	50.5%	51.7%	48.3%	33	7.3%	4.2%	10.2%	6.7%
Upper	176	38.9%	44.1%	37.5%	43.4%	206	45.6%	56.7%	50.3%	61.6%
Unknown	0	0.0%	0.0%	0.1%	0.0%	169	37.4%	36.4%	29.9%	27.5%
<b>Total</b>	<b>452</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>452</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>					<b>By Borrower Income</b>				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Low	125		29.0%		20.5%		29.1%			23.8%
Moderate	59		13.7%		11.3%		13.7%			11.1%
Middle	155		36.0%		46.0%		36.6%			44.3%
Upper	92		21.3%		22.3%		20.3%			20.8%
Unknown	0		0.0%		0.0%		0.0%			0.0%
Tract Unknown	0		0.0%		0.0%		0.3%			0.0%
<b>Total</b>	<b>431</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>			<b>100.0%</b>
	<b>By Revenue</b>					<b>By Loan Size</b>				
\$1 Million or Less	317		73.5%		42.0%		68.7%			45.9%
\$100,000 or less	386		89.6%		42.1%		89.6%			39.7%
\$100,001-\$250,000	24		5.6%		14.8%		5.3%			14.0%
\$250,001-\$1 Million	21		4.9%		43.1%		5.1%			46.3%
<b>Total</b>	<b>431</b>		<b>100.0%</b>		<b>100.0%</b>		<b>100.0%</b>			<b>100.0%</b>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41900

Income Categories	HMDA										
	By Tract Income					By Borrower Income					
	Bank		Aggregate			Bank		Aggregate			
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)	
	<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.1%	0.1%	
Moderate	24	7.0%	6.4%	9.1%	9.1%	4	1.2%	0.8%	0.9%	0.5%	
Middle	212	61.6%	63.6%	64.1%	64.3%	28	8.1%	6.2%	10.1%	7.4%	
Upper	107	31.1%	29.8%	26.5%	26.4%	156	45.3%	52.5%	63.2%	70.0%	
Unknown	1	0.3%	0.2%	0.3%	0.2%	156	45.3%	40.5%	25.6%	22.0%	
<b>Total</b>	<b>344</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>344</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
	<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.3%	0.0%	
Moderate	27	9.5%	9.5%	12.2%	4.2%	2	0.7%	0.2%	1.3%	0.2%	
Middle	175	61.8%	65.4%	61.2%	25.3%	16	5.7%	4.5%	7.2%	2.2%	
Upper	81	28.6%	25.1%	26.5%	70.5%	168	59.4%	68.0%	56.9%	25.4%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	97	34.3%	27.2%	34.2%	72.1%	
<b>Total</b>	<b>283</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>283</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
	<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	8	2.7%	0.6%	5.4%	1.9%	
Moderate	39	13.3%	16.6%	13.8%	14.4%	50	17.1%	6.6%	17.2%	6.5%	
Middle	175	59.7%	55.8%	60.0%	56.7%	90	30.7%	15.3%	29.0%	14.5%	
Upper	79	27.0%	27.6%	26.2%	29.0%	136	46.4%	63.4%	46.2%	66.8%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	9	3.1%	14.1%	2.3%	10.3%	
<b>Total</b>	<b>293</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>293</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
	<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
Middle	1	50.0%	2.6%	50.0%	2.6%	0	0.0%	0.0%	0.0%	0.0%	
Upper	1	50.0%	97.4%	50.0%	97.4%	0	0.0%	0.0%	0.0%	0.0%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	100.0%	100.0%	100.0%	100.0%	
<b>Total</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
	<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	8	0.9%	0.0%	1.3%	0.1%	
Moderate	90	9.8%	7.8%	11.4%	5.5%	56	6.1%	0.9%	4.4%	0.4%	
Middle	563	61.1%	59.9%	62.0%	35.1%	134	14.5%	5.7%	12.6%	3.7%	
Upper	268	29.1%	32.1%	26.5%	59.3%	460	49.9%	55.8%	56.9%	36.7%	
Unknown	1	0.1%	0.1%	0.1%	0.0%	264	28.6%	37.5%	24.8%	59.0%	
<b>Total</b>	<b>922</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>922</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
	<b>SMALL BUSINESS</b>										
	<b>By Tract Income</b>										
		Bank		Aggregate				Bank		Aggregate	
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)	
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
Moderate	28	8.1%	11.7%	8.1%	11.7%	28	8.1%	11.7%	8.1%	11.7%	
Middle	210	61.0%	62.1%	61.0%	62.1%	210	61.0%	62.1%	61.0%	62.1%	
Upper	106	30.8%	26.2%	30.8%	26.2%	106	30.8%	26.2%	30.8%	26.3%	
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%	
<b>Total</b>	<b>344</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>344</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
	<b>By Revenue</b>										
\$1 Million or Less	260	75.6%	41.0%	71.6%	46.3%						
	<b>By Loan Size</b>										
\$100,000 or less	304	88.4%	42.4%	86.7%	38.3%						
\$100,001-\$250,000	25	7.3%	21.8%	8.6%	25.2%						
\$250,001-\$1 Million	15	4.4%	35.7%	4.7%	36.5%						
<b>Total</b>	<b>344</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>						

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 25020

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.3%	0.1%
Moderate	16	9.8%	13.0%	6.7%	8.5%	2	1.2%	1.1%	6.7%	4.8%
Middle	125	76.2%	73.7%	78.1%	77.4%	1	0.6%	0.5%	12.4%	11.0%
Upper	23	14.0%	13.3%	15.2%	14.1%	32	19.5%	26.7%	41.0%	49.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	129	78.7%	71.7%	39.7%	34.3%
<b>Total</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	0.5%	0.4%	1.1%	0.7%
Moderate	4	2.0%	2.8%	4.3%	4.7%	7	3.5%	2.6%	4.0%	3.0%
Middle	154	77.4%	78.4%	77.6%	76.5%	10	5.0%	5.5%	7.0%	6.3%
Upper	41	20.6%	18.9%	18.1%	18.9%	48	24.1%	31.2%	26.5%	32.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	133	66.8%	60.3%	61.5%	57.7%
<b>Total</b>	<b>199</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>199</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	10	5.7%	1.8%	5.8%	3.0%
Moderate	10	5.7%	6.7%	5.0%	5.0%	41	23.6%	12.9%	23.6%	11.4%
Middle	141	81.0%	80.6%	80.2%	80.8%	35	20.1%	13.3%	21.9%	18.5%
Upper	23	13.2%	12.8%	14.9%	14.2%	68	39.1%	49.1%	40.5%	53.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	11.5%	22.9%	8.3%	14.0%
<b>Total</b>	<b>174</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>174</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	11	2.0%	0.4%	1.7%	0.6%
Moderate	30	5.6%	7.6%	5.1%	6.2%	50	9.3%	2.9%	8.2%	4.1%
Middle	420	78.2%	76.5%	78.2%	77.0%	46	8.6%	4.0%	11.2%	8.6%
Upper	87	16.2%	15.8%	16.7%	16.9%	148	27.6%	30.8%	33.1%	39.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	282	52.5%	62.0%	45.8%	47.0%
<b>Total</b>	<b>537</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>537</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	6	3.9%	1.6%	1.6%	1.6%	4.3%	1.6%	4.3%	1.6%	1.6%
Middle	113	72.9%	82.7%	82.7%	82.7%	69.0%	82.7%	69.0%	82.7%	82.7%
Upper	36	23.2%	15.7%	15.7%	15.7%	25.5%	15.7%	25.5%	15.7%	15.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	1.1%	0.0%	1.1%	0.0%	0.1%
<b>Total</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	125	80.6%	65.9%	65.9%	65.9%	77.2%	65.9%	77.2%	65.9%	64.9%
<b>By Loan Size</b>										
\$100,000 or less	142	91.6%	44.7%	44.7%	44.7%	88.0%	44.7%	88.0%	44.7%	35.8%
\$100,001-\$250,000	7	4.5%	15.0%	15.0%	15.0%	6.5%	15.0%	6.5%	15.0%	17.8%
\$250,001-\$1 Million	6	3.9%	40.3%	40.3%	40.3%	5.4%	40.3%	5.4%	40.3%	46.4%
<b>Total</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 21940

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	16	5.9%	5.1%	5.3%	5.5%	0	0.0%	0.0%	0.4%	0.2%
Moderate	19	7.0%	4.9%	12.5%	9.6%	4	1.5%	1.0%	6.3%	4.7%
Middle	147	54.2%	58.4%	58.5%	61.7%	5	1.8%	1.4%	14.5%	12.8%
Upper	89	32.8%	31.6%	22.9%	22.4%	47	17.3%	20.2%	46.7%	53.2%
Unknown	0	0.0%	0.0%	0.9%	0.8%	215	79.3%	77.3%	32.1%	29.1%
<b>Total</b>	<b>271</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>271</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	16	8.9%	9.7%	5.8%	6.6%	0	0.0%	0.0%	0.8%	0.8%
Moderate	18	10.1%	6.6%	13.1%	9.8%	5	2.8%	3.1%	3.9%	3.2%
Middle	89	49.7%	52.9%	50.0%	50.3%	9	5.0%	4.6%	8.9%	6.3%
Upper	55	30.7%	30.5%	30.6%	32.9%	53	29.6%	38.5%	37.0%	44.1%
Unknown	1	0.6%	0.3%	0.5%	0.4%	112	62.6%	53.8%	49.4%	45.6%
<b>Total</b>	<b>179</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>179</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	3	2.2%	6.7%	3.5%	5.2%	4	2.9%	0.7%	6.2%	1.4%
Moderate	13	9.6%	13.6%	11.0%	10.8%	24	17.6%	8.6%	16.3%	11.7%
Middle	84	61.8%	52.8%	54.2%	48.0%	37	27.2%	12.8%	28.6%	15.5%
Upper	36	26.5%	26.8%	30.4%	35.8%	53	39.0%	42.8%	41.0%	48.0%
Unknown	0	0.0%	0.0%	0.9%	0.2%	18	13.2%	35.1%	7.9%	23.3%
<b>Total</b>	<b>136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>136</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	35	6.0%	6.7%	5.2%	5.9%	4	0.7%	0.0%	1.3%	0.5%
Moderate	50	8.5%	6.0%	12.5%	9.7%	33	5.6%	2.1%	6.7%	4.3%
Middle	321	54.7%	56.3%	54.6%	56.7%	51	8.7%	3.2%	14.3%	10.3%
Upper	180	30.7%	30.9%	26.9%	27.0%	153	26.1%	27.6%	42.2%	49.4%
Unknown	1	0.2%	0.1%	0.7%	0.6%	346	58.9%	67.0%	35.5%	35.6%
<b>Total</b>	<b>587</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>587</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	13	9.3%	3.1%	10.7%	5.6%					
Moderate	38	27.1%	24.6%	26.9%	23.2%					
Middle	54	38.6%	42.5%	36.5%	40.2%					
Upper	34	24.3%	29.3%	21.8%	30.4%					
Unknown	1	0.7%	0.5%	0.5%	0.4%					
Tract Unknown	0	0.0%	0.0%	3.6%	0.2%					
<b>Total</b>	<b>140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	108	77.1%	47.6%	65.5%	52.6%					
<b>By Loan Size</b>										
\$100,000 or less	116	82.9%	27.7%	83.8%	27.6%					
\$100,001-\$250,000	15	10.7%	21.2%	11.2%	27.4%					
\$250,001-\$1 Million	9	6.4%	51.2%	5.1%	45.0%					
<b>Total</b>	<b>140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 49500

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.4%	0.1%
Moderate	13	9.3%	10.1%	12.2%	10.7%	0	0.0%	0.0%	0.0%	0.0%
Middle	73	52.1%	51.8%	54.8%	57.7%	6	4.3%	3.4%	6.5%	4.8%
Upper	54	38.6%	38.1%	33.0%	31.6%	48	34.3%	42.3%	57.3%	66.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	86	61.4%	54.3%	35.8%	28.5%
<b>Total</b>	<b>140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.2%	0.2%
Moderate	18	15.4%	15.3%	11.2%	10.8%	0	0.0%	0.0%	1.6%	0.8%
Middle	54	46.2%	49.6%	49.3%	50.6%	7	6.0%	3.0%	6.8%	4.7%
Upper	45	38.5%	35.1%	39.5%	38.6%	68	58.1%	67.9%	61.4%	68.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	42	35.9%	28.3%	29.9%	25.8%
<b>Total</b>	<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.3%	1.1%
Moderate	15	9.5%	11.3%	8.5%	6.8%	15	9.5%	3.4%	11.4%	3.9%
Middle	108	68.4%	56.0%	69.1%	62.1%	29	18.4%	8.1%	16.1%	6.3%
Upper	35	22.2%	32.7%	22.5%	31.1%	106	67.1%	73.5%	67.4%	79.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	8	5.1%	15.0%	3.8%	9.4%
<b>Total</b>	<b>158</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>158</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.5%	0.2%
Moderate	46	11.1%	12.3%	10.8%	10.4%	15	3.6%	0.4%	3.6%	0.7%
Middle	235	56.6%	51.4%	55.8%	53.9%	42	10.1%	4.1%	9.0%	4.9%
Upper	134	32.3%	36.3%	33.4%	35.7%	222	53.5%	56.1%	61.7%	68.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	136	32.8%	39.4%	25.2%	25.9%
<b>Total</b>	<b>415</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>415</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		0.0%	0.0%				
Moderate	76	39.0%	49.5%		34.4%	42.8%				
Middle	88	45.1%	39.6%		48.9%	45.0%				
Upper	31	15.9%	10.9%		14.5%	12.1%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		2.3%	0.2%				
<b>Total</b>	<b>195</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	141	72.3%	33.4%		66.0%	43.8%				
<b>By Loan Size</b>										
\$100,000 or less	177	90.8%	42.0%		88.2%	37.2%				
\$100,001-\$250,000	9	4.6%	16.2%		6.5%	20.6%				
\$250,001-\$1 Million	9	4.6%	41.9%		5.3%	42.2%				
<b>Total</b>	<b>195</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Non MSA A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	11.5%	7.7%	19.9%	23.0%	1	1.9%	1.3%	6.6%	2.1%
Middle	40	76.9%	78.7%	62.9%	63.9%	3	5.8%	5.6%	11.9%	11.4%
Upper	6	11.5%	13.6%	15.9%	11.7%	13	25.0%	37.3%	47.7%	62.2%
Unknown	0	0.0%	0.0%	1.3%	1.4%	35	67.3%	55.8%	33.8%	24.2%
<b>Total</b>	<b>52</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>52</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.4%	0.1%
Moderate	6	9.1%	10.8%	10.1%	11.2%	1	1.5%	1.5%	0.8%	0.5%
Middle	57	86.4%	84.9%	75.5%	73.9%	3	4.5%	4.1%	12.7%	8.0%
Upper	3	4.5%	4.3%	11.4%	10.7%	23	34.8%	42.8%	49.8%	59.2%
Unknown	0	0.0%	0.0%	3.0%	4.2%	39	59.1%	51.6%	36.3%	32.2%
<b>Total</b>	<b>66</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>66</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	1.4%	0.2%	1.8%	0.2%
Moderate	25	18.0%	19.7%	17.7%	17.1%	23	16.5%	8.4%	17.1%	8.0%
Middle	106	76.3%	75.9%	75.6%	77.9%	47	33.8%	21.4%	32.9%	20.4%
Upper	8	5.8%	4.5%	6.7%	5.1%	57	41.0%	51.2%	42.1%	56.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	7.2%	18.8%	6.1%	15.4%
<b>Total</b>	<b>139</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>139</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	2	0.8%	0.0%	0.7%	0.1%
Moderate	37	14.4%	11.9%	15.0%	15.8%	25	9.7%	3.0%	7.2%	1.8%
Middle	203	79.0%	80.8%	72.1%	70.9%	53	20.6%	8.7%	18.5%	10.4%
Upper	17	6.6%	7.4%	11.2%	10.5%	93	36.2%	43.0%	46.9%	59.9%
Unknown	0	0.0%	0.0%	1.6%	2.9%	84	32.7%	45.3%	26.6%	27.9%
<b>Total</b>	<b>257</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>257</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>			
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	30	22.6%	21.4%	22.5%	24.4%	22.5%	24.4%	22.5%	24.4%	24.4%
Middle	85	63.9%	67.7%	63.1%	66.3%	63.1%	66.3%	63.1%	66.3%	66.3%
Upper	18	13.5%	11.0%	13.8%	9.3%	13.8%	9.3%	13.8%	9.3%	9.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.6%	0.0%	0.6%	0.0%	0.6%	0.0%	0.0%
<b>Total</b>	<b>133</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	112	84.2%	65.7%	78.8%	62.8%	78.8%	62.8%	78.8%	62.8%	62.8%
<b>By Loan Size</b>										
\$100,000 or less	125	94.0%	57.6%	91.3%	53.7%	91.3%	53.7%	91.3%	53.7%	53.7%
\$100,001-\$250,000	4	3.0%	10.4%	6.3%	20.9%	6.3%	20.9%	6.3%	20.9%	20.9%
\$250,001-\$1 Million	4	3.0%	32.0%	2.5%	25.4%	2.5%	25.4%	2.5%	25.4%	25.4%
<b>Total</b>	<b>133</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Non MSA B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	4	1.9%	1.4%	8.0%	8.5%	1	0.5%	0.2%	1.4%	0.8%
Middle	107	51.9%	47.4%	51.8%	48.1%	4	1.9%	1.7%	13.8%	12.0%
Upper	95	46.1%	51.2%	40.0%	43.3%	37	18.0%	21.7%	47.3%	54.3%
Unknown	0	0.0%	0.0%	0.2%	0.1%	164	79.6%	76.4%	37.5%	32.9%
<b>Total</b>	<b>206</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>206</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.6%	0.1%
Moderate	1	0.5%	0.5%	3.0%	1.4%	0	0.0%	0.0%	1.2%	0.4%
Middle	75	37.3%	35.3%	52.8%	73.4%	8	4.0%	3.3%	6.3%	2.5%
Upper	125	62.2%	64.2%	44.0%	25.1%	87	43.3%	47.5%	47.0%	27.3%
Unknown	0	0.0%	0.0%	0.1%	0.1%	106	52.7%	49.2%	44.8%	69.7%
<b>Total</b>	<b>201</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>201</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	1.0%	0.4%
Moderate	13	8.3%	8.4%	9.1%	9.7%	21	13.5%	4.6%	12.0%	3.5%
Middle	102	65.4%	61.5%	58.7%	45.8%	43	27.6%	14.2%	28.4%	17.0%
Upper	41	26.3%	30.2%	32.2%	44.5%	80	51.3%	53.7%	52.9%	62.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	12	7.7%	27.5%	5.8%	16.9%
<b>Total</b>	<b>156</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>156</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.4%	0.1%
Moderate	18	3.2%	1.4%	5.7%	3.7%	22	3.9%	0.4%	2.8%	0.6%
Middle	284	50.4%	42.7%	53.3%	65.3%	55	9.8%	3.2%	12.2%	5.6%
Upper	261	46.4%	55.9%	40.9%	30.9%	204	36.2%	35.7%	47.9%	36.1%
Unknown	0	0.0%	0.0%	0.1%	0.1%	282	50.1%	60.7%	36.7%	57.7%
<b>Total</b>	<b>563</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>563</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	33	23.6%	25.0%	22.4%	26.1%	22.4%	26.1%	22.4%	26.1%	26.1%
Middle	59	42.1%	49.2%	40.1%	46.8%	40.1%	46.8%	40.1%	46.8%	46.8%
Upper	48	34.3%	25.8%	35.4%	27.1%	35.4%	27.1%	35.4%	27.1%	27.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	2.1%	0.0%	2.1%	0.0%	0.0%
<b>Total</b>	<b>140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	103	73.6%	37.5%	68.2%	42.0%	68.2%	42.0%	68.2%	42.0%	42.0%
<b>By Loan Size</b>										
\$100,000 or less	131	93.6%	52.1%	91.7%	45.6%	91.7%	45.6%	91.7%	45.6%	45.6%
\$100,001-\$250,000	5	3.6%	13.4%	3.6%	12.0%	3.6%	12.0%	3.6%	12.0%	12.0%
\$250,001-\$1 Million	4	2.9%	34.5%	4.7%	42.4%	4.7%	42.4%	4.7%	42.4%	42.4%
<b>Total</b>	<b>140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Non MSA C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	Bank % \$(000s)	Aggregate % \$(000s)	% \$(000s)	#	%	Bank % \$(000s)	Aggregate % \$(000s)	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	57.1%	75.0%	77.3%	82.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	3	42.9%	25.0%	22.7%	17.8%	4	57.1%	79.9%	86.4%	92.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	42.9%	20.1%	13.6%	7.4%
<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.8%	2.9%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	100.0%	100.0%	80.8%	90.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	11.5%	5.2%	3	100.0%	100.0%	73.1%	87.5%
Unknown	0	0.0%	0.0%	7.7%	4.5%	0	0.0%	0.0%	23.1%	9.5%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.2%	0.4%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	9.1%	2.7%	8.3%	1.4%
Middle	16	72.7%	64.3%	75.0%	80.9%	6	27.3%	8.9%	25.0%	4.7%
Upper	6	27.3%	35.7%	25.0%	19.1%	14	63.6%	88.5%	62.5%	93.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.8%	1.5%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	6.3%	0.5%	2.8%	0.1%
Middle	23	71.9%	80.6%	77.8%	86.1%	6	18.8%	1.6%	8.3%	0.5%
Upper	9	28.1%	19.4%	19.4%	11.7%	21	65.6%	87.5%	73.6%	90.2%
Unknown	0	0.0%	0.0%	2.8%	2.2%	3	9.4%	10.4%	12.5%	7.7%
<b>Total</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank			Aggregate					
		%	% \$(000s)	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Middle	33	68.8%	46.4%	46.4%	60.6%	46.4%	60.6%	46.4%	60.6%	46.4%
Upper	15	31.3%	53.6%	53.6%	22.5%	50.9%	22.5%	50.9%	22.5%	50.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	16.9%	2.7%	16.9%	2.7%	16.9%	2.7%
<b>Total</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	38	79.2%	80.5%	80.5%	60.6%	77.8%	60.6%	77.8%	60.6%	77.8%
<b>By Loan Size</b>										
\$100,000 or less	44	91.7%	45.3%	45.3%	94.4%	48.2%	94.4%	48.2%	94.4%	48.2%
\$100,001-\$250,000	2	4.2%	12.1%	12.1%	2.8%	11.5%	2.8%	11.5%	2.8%	11.5%
\$250,001-\$1 Million	2	4.2%	42.6%	42.6%	2.8%	40.3%	2.8%	40.3%	2.8%	40.3%
<b>Total</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2013 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Non MSA C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	7	63.6%	76.5%	69.2%	83.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	4	36.4%	23.5%	26.9%	15.1%	6	54.5%	58.4%	76.9%	81.6%
Unknown	0	0.0%	0.0%	3.8%	1.3%	5	45.5%	41.6%	23.1%	18.4%
<b>Total</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	7	77.8%	65.7%	69.6%	46.0%	0	0.0%	0.0%	8.7%	1.6%
Upper	2	22.2%	34.3%	21.7%	49.1%	5	55.6%	76.8%	56.5%	79.3%
Unknown	0	0.0%	0.0%	8.7%	4.9%	4	44.4%	23.2%	34.8%	19.2%
<b>Total</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	2.8%	0.4%	8.3%	2.8%
Moderate	0	0.0%	0.0%	0.0%	0.0%	4	11.1%	5.5%	14.6%	8.2%
Middle	32	88.9%	84.9%	85.4%	81.7%	11	30.6%	17.2%	22.9%	14.4%
Upper	4	11.1%	15.1%	14.6%	18.3%	18	50.0%	61.3%	50.0%	61.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	5.6%	15.6%	4.2%	13.1%
<b>Total</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	1.8%	0.0%	4.1%	0.1%
Moderate	0	0.0%	0.0%	0.0%	0.0%	4	7.1%	0.6%	7.2%	0.4%
Middle	46	82.1%	72.6%	77.3%	65.1%	11	19.6%	1.9%	13.4%	1.5%
Upper	10	17.9%	27.4%	19.6%	31.9%	29	51.8%	66.9%	58.8%	79.4%
Unknown	0	0.0%	0.0%	3.1%	3.0%	11	19.6%	30.5%	16.5%	18.5%
<b>Total</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	Bank			Aggregate						
	#	%	% \$(000s)	%	% \$(000s)					
Low	0	0.0%	0.0%	0.0%	0.0%					0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%					0.0%
Middle	41	87.2%	84.7%	84.7%	77.0%					79.2%
Upper	6	12.8%	15.3%	15.3%	16.4%					20.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%					0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	6.6%					0.6%
<b>Total</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	38	80.9%	60.9%	72.1%	62.9%					
<b>By Loan Size</b>										
\$100,000 or less	38	80.9%	31.3%	83.6%	31.0%					
\$100,001-\$250,000	6	12.8%	32.7%	11.5%	35.7%					
\$250,001-\$1 Million	3	6.4%	36.0%	4.9%	33.3%					
<b>Total</b>	<b>47</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41980

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	123	2.5%	1.7%	2.5%	1.9%	14	0.3%	0.1%	0.9%	0.4%
Moderate	810	16.5%	13.5%	20.0%	16.0%	199	4.1%	1.9%	7.7%	4.1%
Middle	1,648	33.5%	26.6%	35.7%	30.8%	423	8.6%	5.7%	17.2%	11.8%
Upper	2,332	47.5%	58.1%	41.7%	51.2%	2,094	42.6%	54.5%	59.2%	70.9%
Unknown	0	0.0%	0.0%	0.1%	0.1%	2,183	44.4%	37.8%	15.0%	12.8%
<b>Total</b>	<b>4,913</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,913</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	72	1.5%	1.2%	1.9%	1.5%	29	0.6%	0.4%	1.2%	0.7%
Moderate	631	12.9%	10.2%	15.3%	12.0%	145	3.0%	1.7%	4.1%	2.4%
Middle	1,497	30.5%	25.7%	34.7%	30.5%	386	7.9%	5.1%	9.3%	6.4%
Upper	2,708	55.2%	63.0%	48.1%	55.9%	2,926	59.6%	66.1%	51.2%	59.0%
Unknown	0	0.0%	0.0%	0.1%	0.1%	1,422	29.0%	26.7%	34.2%	31.6%
<b>Total</b>	<b>4,908</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,908</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	109	2.5%	1.9%	2.4%	1.9%	315	7.2%	1.7%	8.0%	1.8%
Moderate	1,325	30.4%	20.7%	27.9%	18.6%	978	22.5%	8.1%	21.6%	8.6%
Middle	1,691	38.8%	30.5%	40.1%	33.7%	1,016	23.3%	13.2%	22.3%	13.6%
Upper	1,228	28.2%	47.0%	29.6%	45.9%	1,838	42.2%	58.0%	44.4%	63.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	206	4.7%	19.1%	3.7%	12.9%
<b>Total</b>	<b>4,353</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,353</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	14.3%	0.1%	7.1%	0.1%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	14.3%	10.5%	35.7%	15.6%	0	0.0%	0.0%	0.0%	0.0%
Upper	5	71.4%	89.4%	57.1%	84.2%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA Totals</b>										
Low	304	2.1%	1.5%	2.1%	1.6%	358	2.5%	0.4%	2.0%	0.6%
Moderate	2,767	19.5%	12.4%	18.6%	13.8%	1,322	9.3%	2.3%	7.7%	3.3%
Middle	4,837	34.1%	26.4%	35.8%	30.7%	1,825	12.9%	5.9%	13.7%	8.8%
Upper	6,273	44.2%	59.7%	43.5%	53.7%	6,858	48.4%	59.9%	53.1%	63.9%
Unknown	0	0.0%	0.0%	0.1%	0.1%	3,818	26.9%	31.5%	23.5%	23.5%
<b>Total</b>	<b>14,181</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14,181</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>%</b>	<b>% \$(000s)</b>	<b>% \$(000s)</b>
Low	354	4.4%	4.4%	4.0%	4.2%					
Moderate	1,736	21.6%	20.0%	18.7%	19.7%					
Middle	2,240	27.9%	26.0%	24.7%	25.5%					
Upper	3,640	45.3%	48.6%	42.4%	48.9%					
Unknown	72	0.9%	1.0%	0.8%	1.1%					
Tract Unknown	0	0.0%	0.0%	0.8%	0.6%					
<b>Total</b>	<b>8,042</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	5,663	70.4%	43.6%	58.3%	44.7%					
<b>By Loan Size</b>										
\$100,000 or less	6,770	84.2%	35.4%	84.1%	31.0%					
\$100,001-\$250,000	755	9.4%	22.1%	9.0%	21.6%					
\$250,001-\$1 Million	517	6.4%	42.5%	6.9%	47.4%					
<b>Total</b>	<b>8,042</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 10380

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	3	0.7%	0.3%	1.1%	0.7%	0	0.0%	0.0%	0.0%	0.0%
Moderate	39	9.0%	7.3%	8.5%	7.6%	14	3.2%	1.5%	2.6%	1.3%
Middle	296	68.4%	71.8%	70.8%	71.0%	38	8.8%	5.3%	12.4%	7.7%
Upper	95	21.9%	20.5%	19.5%	20.6%	327	75.5%	83.0%	79.8%	86.6%
Unknown	0	0.0%	0.0%	0.1%	0.1%	54	12.5%	10.2%	5.2%	4.4%
<b>Total</b>	<b>433</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>433</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	2	0.6%	0.4%	0.9%	0.8%	0	0.0%	0.0%	0.2%	0.1%
Moderate	17	5.5%	4.7%	7.0%	6.0%	3	1.0%	0.4%	1.8%	0.9%
Middle	202	65.2%	67.1%	64.9%	64.4%	15	4.8%	2.5%	7.0%	4.4%
Upper	89	28.7%	27.7%	27.2%	28.8%	255	82.3%	87.0%	76.7%	81.8%
Unknown	0	0.0%	0.0%	0.1%	0.0%	37	11.9%	10.0%	14.3%	12.8%
<b>Total</b>	<b>310</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>310</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	7	1.6%	0.8%	1.8%	0.6%	8	1.8%	0.6%	3.0%	0.6%
Moderate	43	9.9%	12.4%	10.4%	11.4%	46	10.6%	3.9%	11.3%	3.9%
Middle	289	66.3%	66.6%	66.5%	65.6%	120	27.5%	12.6%	25.5%	10.7%
Upper	97	22.2%	20.2%	21.2%	22.5%	255	58.5%	74.5%	58.9%	79.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	1.6%	8.4%	1.2%	5.5%
<b>Total</b>	<b>436</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>436</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>HMDA Totals</b>									
Low	12	1.0%	0.4%	1.1%	0.8%	8	0.7%	0.1%	0.6%	0.1%
Moderate	99	8.4%	6.7%	8.1%	6.9%	63	5.3%	1.2%	3.8%	1.2%
Middle	787	66.8%	69.5%	67.2%	67.1%	173	14.7%	4.8%	12.1%	6.0%
Upper	281	23.8%	23.4%	23.5%	25.2%	837	71.0%	83.9%	74.5%	83.6%
Unknown	0	0.0%	0.0%	0.1%	0.1%	98	8.3%	10.0%	8.9%	9.2%
<b>Total</b>	<b>1,179</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,179</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	% \$(000s)
Low	39	4.1%	4.0%	4.0%	4.0%	4.0%	4.0%	4.0%	4.0%	4.0%
Moderate	142	14.9%	13.9%	13.9%	13.5%	13.5%	14.0%	14.0%	14.0%	14.0%
Middle	546	57.5%	56.9%	57.3%	57.3%	57.3%	57.7%	57.7%	57.7%	57.7%
Upper	223	23.5%	25.2%	21.4%	23.9%	23.9%	23.9%	23.9%	23.9%	23.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	3.8%	0.4%	0.4%	0.4%	0.4%	0.4%	0.4%
<b>Total</b>	<b>950</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>By Revenue</b>									
\$1 Million or Less	699	73.6%	56.0%	68.4%	57.9%	57.9%	57.9%	57.9%	57.9%	57.9%
	<b>By Loan Size</b>									
\$100,000 or less	863	90.8%	48.3%	90.0%	45.9%	45.9%	45.9%	45.9%	45.9%	45.9%
\$100,001-\$250,000	53	5.6%	19.6%	6.5%	22.7%	22.7%	22.7%	22.7%	22.7%	22.7%
\$250,001-\$1 Million	34	3.6%	32.1%	3.5%	31.4%	31.4%	31.4%	31.4%	31.4%	31.4%
<b>Total</b>	<b>950</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 38660

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	3	0.6%	0.4%	1.9%	1.6%	1	0.2%	0.1%	0.3%	0.1%
Moderate	40	7.7%	5.9%	11.6%	9.9%	34	6.5%	3.8%	5.9%	3.5%
Middle	154	29.6%	24.9%	34.8%	33.7%	60	11.5%	8.6%	17.1%	13.4%
Upper	324	62.2%	68.7%	51.7%	54.8%	268	51.4%	56.8%	62.6%	69.5%
Unknown	0	0.0%	0.0%	0.0%	0.0%	158	30.3%	30.7%	14.2%	13.5%
<b>Total</b>	<b>521</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>521</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	1	0.4%	0.4%	1.1%	0.9%	1	0.4%	0.3%	0.6%	0.3%
Moderate	23	8.7%	7.5%	14.4%	11.4%	3	1.1%	0.7%	3.4%	2.2%
Middle	58	22.1%	19.5%	22.3%	22.3%	20	7.6%	5.6%	6.8%	4.7%
Upper	181	68.8%	72.6%	62.2%	65.4%	167	63.5%	70.3%	56.2%	63.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	72	27.4%	23.1%	32.9%	29.2%
<b>Total</b>	<b>263</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>263</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	4	1.3%	0.4%	1.2%	1.9%	7	2.2%	0.6%	2.6%	0.5%
Moderate	84	26.5%	19.1%	25.5%	16.9%	62	19.6%	5.2%	18.2%	7.0%
Middle	71	22.4%	22.9%	23.1%	26.0%	81	25.6%	11.9%	22.2%	12.0%
Upper	158	49.8%	57.7%	50.2%	55.2%	151	47.6%	61.7%	53.3%	69.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	16	5.0%	20.6%	3.7%	10.9%
<b>Total</b>	<b>317</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>317</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	100.0%	100.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>HMDA Totals</b>									
Low	8	0.7%	0.4%	1.4%	1.3%	9	0.8%	0.2%	0.8%	0.2%
Moderate	147	13.4%	7.4%	15.0%	11.1%	99	9.0%	2.9%	6.4%	3.0%
Middle	283	25.7%	23.0%	27.1%	27.3%	161	14.6%	7.8%	12.8%	8.7%
Upper	663	60.2%	69.2%	56.6%	60.3%	586	53.2%	61.6%	58.1%	66.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	246	22.3%	27.5%	21.8%	21.8%
<b>Total</b>	<b>1,101</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,101</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)	
Low	6	1.1%	0.3%	1.2%	0.6%	1.2%	0.6%	0.6%	0.6%	
Moderate	100	18.9%	24.8%	19.7%	26.8%	19.7%	26.8%	19.7%	26.8%	
Middle	147	27.8%	24.9%	24.4%	20.1%	24.4%	20.1%	24.4%	20.1%	
Upper	276	52.2%	50.0%	47.2%	51.9%	47.2%	51.9%	47.2%	51.9%	
Unknown	0	0.0%	0.0%	0.2%	0.1%	0.2%	0.1%	0.2%	0.1%	
Tract Unknown	0	0.0%	0.0%	7.3%	0.4%	7.3%	0.4%	7.3%	0.4%	
<b>Total</b>	<b>529</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
	<b>By Revenue</b>									
\$1 Million or Less	377	71.3%	48.9%	59.9%	49.6%	59.9%	49.6%	59.9%	49.6%	
	<b>By Loan Size</b>									
\$100,000 or less	468	88.5%	41.7%	84.9%	32.5%	84.9%	32.5%	84.9%	32.5%	
\$100,001-\$250,000	33	6.2%	17.7%	8.0%	19.5%	8.0%	19.5%	8.0%	19.5%	
\$250,001-\$1 Million	28	5.3%	40.6%	7.1%	48.0%	7.1%	48.0%	7.1%	48.0%	
<b>Total</b>	<b>529</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 32420

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	14	10.0%	6.1%	9.7%	6.9%	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	4.3%	3.4%	5.6%	4.2%	9	6.4%	4.7%	8.7%	5.8%
Middle	78	55.7%	55.9%	54.9%	54.4%	23	16.4%	10.4%	19.1%	13.4%
Upper	42	30.0%	34.6%	29.9%	34.5%	87	62.1%	70.1%	64.9%	73.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	21	15.0%	14.9%	7.3%	7.1%
<b>Total</b>	<b>140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	7	6.6%	6.0%	6.4%	6.8%	1	0.9%	0.5%	0.7%	0.4%
Moderate	1	0.9%	0.7%	3.1%	2.4%	1	0.9%	0.8%	1.1%	0.7%
Middle	55	51.9%	51.0%	47.9%	45.1%	4	3.8%	1.6%	8.6%	5.5%
Upper	43	40.6%	42.3%	42.6%	45.7%	82	77.4%	83.8%	66.2%	75.3%
Unknown	0	0.0%	0.0%	0.0%	0.0%	18	13.3%	13.3%	23.4%	18.1%
<b>Total</b>	<b>106</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>106</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	2	1.6%	0.7%	3.6%	1.5%	3	2.3%	0.5%	6.0%	1.8%
Moderate	10	7.8%	2.3%	8.9%	7.3%	26	20.2%	7.7%	19.6%	7.4%
Middle	73	56.6%	60.7%	56.0%	52.0%	29	22.5%	10.8%	21.4%	9.1%
Upper	44	34.1%	36.4%	31.5%	39.3%	70	54.3%	74.9%	52.4%	77.8%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.8%	6.1%	0.6%	3.9%
<b>Total</b>	<b>129</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>129</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	100.0%	100.0%	100.0%	100.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	100.0%	100.0%	100.0%	100.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>HMDA Totals</b>									
Low	23	6.1%	5.2%	6.9%	6.4%	4	1.1%	0.3%	1.4%	0.3%
Moderate	17	4.5%	1.9%	4.9%	3.1%	36	9.6%	2.9%	6.9%	2.7%
Middle	207	55.1%	57.6%	51.6%	50.3%	56	14.9%	5.8%	14.3%	8.2%
Upper	129	34.3%	35.3%	36.5%	40.2%	239	63.6%	70.8%	63.2%	72.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	41	10.9%	20.3%	14.2%	16.2%
<b>Total</b>	<b>376</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>376</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
	#	Bank			Aggregate					
		%	% \$(000s)	%	%	% \$(000s)	%	% \$(000s)	%	% \$(000s)
Low	137	27.2%	21.1%	26.8%	23.5%					
Moderate	69	13.7%	11.3%	12.6%	11.3%					
Middle	190	37.8%	45.3%	35.9%	42.8%					
Upper	107	21.3%	22.3%	19.2%	22.0%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	5.5%	0.3%					
<b>Total</b>	<b>503</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
	<b>By Revenue</b>									
\$1 Million or Less	344	68.4%	47.6%	60.6%	47.3%					
	<b>By Loan Size</b>									
\$100,000 or less	445	88.5%	42.2%	88.6%	40.5%					
\$100,001-\$250,000	34	6.8%	16.6%	6.8%	17.9%					
\$250,001-\$1 Million	24	4.8%	41.2%	4.7%	41.6%					
<b>Total</b>	<b>503</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 41900

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	14	4.4%	3.6%	7.0%	6.8%	3	1.0%	0.5%	2.2%	1.3%
Middle	205	65.1%	66.5%	69.3%	71.2%	28	8.9%	6.1%	10.5%	7.4%
Upper	94	29.8%	29.7%	23.4%	22.0%	225	71.4%	75.8%	78.9%	83.4%
Unknown	2	0.6%	0.2%	0.3%	0.1%	59	18.7%	17.6%	8.5%	7.9%
<b>Total</b>	<b>315</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>315</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.3%	0.1%
Moderate	34	13.3%	14.7%	13.6%	14.5%	6	2.4%	1.3%	2.9%	1.6%
Middle	163	63.9%	65.3%	63.9%	64.3%	24	9.4%	6.4%	8.8%	6.1%
Upper	58	22.7%	20.0%	22.5%	21.2%	205	80.4%	84.2%	70.3%	75.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	20	7.8%	8.1%	17.8%	16.2%
<b>Total</b>	<b>255</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>255</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	5	1.6%	0.3%	4.7%	0.9%
Moderate	47	14.6%	11.1%	15.1%	9.3%	69	21.4%	7.5%	23.3%	9.1%
Middle	212	65.8%	70.7%	64.9%	72.8%	90	28.0%	15.6%	26.7%	17.5%
Upper	63	19.6%	18.2%	20.0%	17.9%	156	48.4%	70.7%	44.8%	68.1%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	0.6%	6.0%	0.5%	4.4%
<b>Total</b>	<b>322</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>322</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	5	0.6%	0.0%	1.1%	0.1%
Moderate	95	10.7%	8.5%	11.5%	10.5%	78	8.7%	1.4%	7.0%	1.8%
Middle	580	65.0%	66.4%	66.1%	68.1%	142	15.9%	7.0%	13.3%	7.2%
Upper	215	24.1%	25.0%	22.3%	21.4%	586	65.7%	78.6%	68.0%	79.2%
Unknown	2	0.2%	0.1%	0.1%	0.0%	81	9.1%	13.0%	10.6%	11.6%
<b>Total</b>	<b>892</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>892</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		0.0%	0.0%		0.0%		
Moderate	27	6.9%	6.9%		7.2%	9.0%		9.7%		
Middle	259	66.1%	66.1%		71.7%	61.2%		65.9%		
Upper	106	27.0%	27.0%		21.2%	24.2%		23.9%		
Unknown	0	0.0%	0.0%		0.0%	0.2%		0.2%		
Tract Unknown	0	0.0%	0.0%		0.0%	5.4%		0.4%		
<b>Total</b>	<b>392</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>		
<b>By Revenue</b>										
\$1 Million or Less	279	71.2%			46.3%	63.5%		49.1%		
<b>By Loan Size</b>										
\$100,000 or less	358	91.3%			48.9%	90.8%		44.7%		
\$100,001-\$250,000	23	5.9%			22.6%	6.2%		23.6%		
\$250,001-\$1 Million	11	2.8%			28.5%	3.1%		31.7%		
<b>Total</b>	<b>392</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>			

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 25020

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	0.6%	0.3%	0.4%	0.1%
Moderate	41	24.1%	31.7%	12.7%	16.3%	3	1.8%	0.9%	10.6%	7.7%
Middle	105	61.8%	57.7%	72.8%	70.5%	8	4.7%	3.6%	16.8%	14.2%
Upper	24	14.1%	10.6%	14.1%	12.9%	72	42.4%	51.1%	53.4%	60.3%
Unknown	0	0.0%	0.0%	0.4%	0.3%	86	50.6%	44.1%	18.7%	17.6%
<b>Total</b>	<b>170</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>170</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	1.1%	0.3%	1.3%	0.7%
Moderate	2	2.1%	3.9%	5.7%	5.3%	2	2.1%	1.1%	4.9%	3.4%
Middle	74	77.9%	78.0%	78.2%	77.5%	6	6.3%	5.9%	10.8%	9.2%
Upper	19	20.0%	18.1%	16.1%	17.2%	36	37.9%	44.0%	39.6%	48.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	50	52.6%	48.7%	43.4%	38.8%
<b>Total</b>	<b>95</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>95</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	3	1.4%	0.6%	1.9%	0.9%
Moderate	16	7.6%	6.6%	7.3%	6.6%	33	15.6%	8.1%	15.4%	7.9%
Middle	154	73.0%	71.8%	72.6%	73.1%	54	25.6%	16.8%	25.1%	17.4%
Upper	41	19.4%	21.5%	20.1%	20.3%	111	52.6%	54.2%	53.7%	59.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	10	4.7%	20.3%	3.9%	14.8%
<b>Total</b>	<b>211</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>211</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	5	1.1%	0.3%	1.1%	0.4%
Moderate	59	12.4%	20.7%	8.8%	11.0%	38	8.0%	2.0%	9.4%	5.9%
Middle	333	70.0%	65.2%	74.8%	73.6%	68	14.3%	6.0%	16.3%	12.3%
Upper	84	17.6%	14.2%	16.2%	15.2%	219	46.0%	49.6%	48.1%	55.0%
Unknown	0	0.0%	0.0%	0.2%	0.1%	146	30.7%	42.0%	25.2%	26.3%
<b>Total</b>	<b>476</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>476</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)		%	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%
Moderate	5	3.2%	3.2%	2.7%	2.7%		3.6%	2.7%	2.7%	2.7%
Middle	111	72.1%	66.2%	68.5%	69.5%		68.5%	69.5%	69.5%	69.5%
Upper	38	24.7%	31.2%	23.4%	27.6%		23.4%	27.6%	27.6%	27.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%		0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.2%		4.6%	0.2%	0.2%	0.2%
<b>Total</b>	<b>154</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	126	81.8%	66.6%	75.1%	67.0%					
<b>By Loan Size</b>										
\$100,000 or less	146	94.8%	60.3%	92.9%	54.3%					
\$100,001-\$250,000	4	2.6%	9.7%	4.1%	13.2%					
\$250,001-\$1 Million	4	2.6%	30.0%	3.0%	32.5%					
<b>Total</b>	<b>154</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 21940

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
	<b>Home Purchase</b>									
Low	11	6.5%	7.1%	4.9%	5.4%	0	0.0%	0.0%	0.5%	0.2%
Moderate	29	17.3%	15.0%	13.1%	11.0%	2	1.2%	0.9%	14.5%	9.6%
Middle	67	39.9%	43.4%	55.0%	57.8%	5	3.0%	3.6%	15.6%	13.9%
Upper	59	35.1%	33.3%	25.9%	24.8%	52	31.0%	40.2%	51.3%	62.4%
Unknown	2	1.2%	1.3%	1.1%	1.0%	109	64.9%	55.4%	18.1%	13.9%
<b>Total</b>	<b>168</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>168</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Refinance</b>									
Low	19	15.2%	15.0%	6.0%	6.6%	0	0.0%	0.0%	0.5%	0.2%
Moderate	2	1.6%	1.5%	13.0%	10.4%	4	3.2%	2.0%	4.2%	2.6%
Middle	70	56.0%	60.0%	54.4%	56.6%	9	7.2%	4.5%	11.9%	8.1%
Upper	34	27.2%	23.4%	25.8%	25.5%	79	63.2%	67.5%	50.0%	59.0%
Unknown	0	0.0%	0.0%	0.8%	0.9%	33	26.4%	26.0%	33.4%	30.1%
<b>Total</b>	<b>125</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>125</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Home Improvement</b>									
Low	3	2.6%	0.8%	2.4%	0.6%	12	10.5%	6.2%	10.1%	4.9%
Moderate	12	10.5%	5.8%	13.7%	15.2%	17	14.9%	6.5%	16.7%	6.1%
Middle	61	53.5%	56.8%	50.0%	52.1%	35	30.7%	12.7%	25.6%	13.4%
Upper	38	33.3%	36.7%	33.9%	32.1%	46	40.4%	54.2%	45.2%	62.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	3.5%	20.4%	2.4%	13.2%
<b>Total</b>	<b>114</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>114</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>Multi-Family</b>									
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
	<b>HMDA Totals</b>									
Low	33	8.1%	10.4%	5.1%	5.9%	12	2.9%	0.4%	1.6%	0.3%
Moderate	43	10.6%	8.1%	13.1%	10.8%	23	5.7%	1.8%	10.3%	6.0%
Middle	198	48.6%	52.0%	54.2%	57.1%	49	12.0%	4.6%	15.2%	11.0%
Upper	131	32.2%	28.9%	26.8%	25.3%	177	43.5%	53.9%	50.0%	60.7%
Unknown	2	0.5%	0.6%	0.8%	0.9%	146	35.9%	39.4%	22.9%	21.9%
<b>Total</b>	<b>407</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>407</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>									
	<b>By Tract Income</b>									
		Bank			Aggregate					
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Low	16	10.5%	3.5%	6.9%	3.0%					
Moderate	30	19.7%	12.0%	16.9%	11.3%					
Middle	59	38.8%	48.0%	30.2%	46.3%					
Upper	46	30.3%	36.0%	24.6%	37.0%					
Unknown	1	0.7%	0.6%	0.4%	0.5%					
Tract Unknown	0	0.0%	0.0%	21.0%	1.9%					
<b>Total</b>	<b>152</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
	<b>By Revenue</b>									
\$1 Million or Less	117	77.0%	53.9%	52.4%	53.0%					
	<b>By Loan Size</b>									
\$100,000 or less	134	88.2%	42.0%	91.1%	41.6%					
\$100,001-\$250,000	13	8.6%	26.2%	6.5%	28.0%					
\$250,001-\$1 Million	5	3.3%	31.9%	2.4%	30.5%					
<b>Total</b>	<b>152</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: MSA 49500

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	12	10.3%	9.8%	15.1%	14.3%	0	0.0%	0.0%	2.8%	2.1%
Middle	55	47.4%	52.2%	44.6%	48.1%	20	17.2%	13.0%	17.5%	13.7%
Upper	49	42.2%	38.0%	40.2%	37.6%	63	54.3%	64.3%	66.1%	73.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	33	28.4%	22.7%	13.5%	11.1%
<b>Total</b>	<b>116</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>116</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.3%	0.1%
Moderate	14	15.9%	16.3%	11.4%	11.1%	1	1.1%	0.9%	1.3%	0.8%
Middle	44	50.0%	51.5%	46.2%	49.5%	9	10.2%	7.0%	6.6%	4.6%
Upper	30	34.1%	32.3%	41.9%	38.7%	61	69.3%	73.0%	65.5%	70.5%
Unknown	0	0.0%	0.0%	0.5%	0.8%	17	19.3%	19.1%	26.3%	23.9%
<b>Total</b>	<b>88</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>88</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.5%	0.1%
Moderate	27	17.1%	18.3%	17.1%	16.5%	16	10.1%	3.1%	10.9%	2.7%
Middle	93	58.9%	53.8%	55.4%	42.5%	43	27.2%	12.8%	24.4%	9.9%
Upper	38	24.1%	27.9%	27.5%	41.0%	97	61.4%	76.2%	63.2%	82.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	2	1.3%	7.9%	1.0%	4.6%
<b>Total</b>	<b>158</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>158</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.2%	0.1%
Moderate	53	14.6%	13.2%	13.9%	12.7%	17	4.7%	0.7%	4.0%	1.4%
Middle	192	53.0%	52.1%	47.9%	48.4%	72	19.9%	10.7%	14.1%	8.4%
Upper	117	32.3%	34.7%	38.0%	38.4%	221	61.0%	68.9%	65.2%	72.3%
Unknown	0	0.0%	0.0%	0.2%	0.5%	52	14.4%	19.6%	16.4%	17.8%
<b>Total</b>	<b>362</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>362</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank			Aggregate					
		%	% \$(000s)		%	% \$(000s)				
Low	0	0.0%	0.0%		0.0%	0.0%		0.0%	0.0%	
Moderate	72	35.5%	31.6%		29.6%	31.8%				
Middle	98	48.3%	60.4%		46.2%	54.3%				
Upper	33	16.3%	8.0%		14.5%	13.0%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		9.7%	0.9%				
<b>Total</b>	<b>203</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	149	73.4%	54.6%		63.5%	54.4%				
<b>By Loan Size</b>										
\$100,000 or less	192	94.6%	53.0%		93.1%	46.2%				
\$100,001-\$250,000	5	2.5%	8.5%		3.5%	12.5%				
\$250,001-\$1 Million	6	3.0%	38.5%		3.5%	41.2%				
<b>Total</b>	<b>203</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Non MSA A

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	7	17.9%	14.9%	15.5%	13.1%	2	5.1%	3.2%	3.1%	1.8%
Middle	28	71.8%	72.3%	72.2%	72.7%	3	7.7%	7.6%	9.3%	7.9%
Upper	4	10.3%	12.9%	11.3%	13.2%	22	56.4%	60.9%	74.2%	78.3%
Unknown	0	0.0%	0.0%	1.0%	1.1%	12	30.8%	28.3%	13.4%	12.0%
<b>Total</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.5%	0.4%
Moderate	7	20.0%	20.6%	15.8%	14.9%	0	0.0%	0.0%	2.7%	1.8%
Middle	28	80.0%	79.4%	75.1%	75.1%	2	5.7%	4.3%	7.7%	6.2%
Upper	0	0.0%	0.0%	9.0%	9.9%	26	74.3%	76.3%	64.3%	68.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	7	20.0%	19.4%	24.9%	23.3%
<b>Total</b>	<b>35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	5	4.3%	1.2%	5.2%	1.4%
Moderate	17	14.7%	9.7%	14.2%	12.4%	19	16.4%	10.3%	17.2%	9.1%
Middle	84	72.4%	80.0%	73.9%	80.0%	26	22.4%	19.3%	20.9%	14.7%
Upper	15	12.9%	10.3%	11.9%	7.7%	65	56.0%	65.7%	56.0%	72.2%
Unknown	0	0.0%	0.0%	0.0%	0.0%	1	0.9%	3.5%	0.7%	2.5%
<b>Total</b>	<b>116</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>116</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	5	2.6%	0.2%	1.8%	0.3%
Moderate	31	16.3%	16.6%	15.3%	14.3%	21	11.1%	2.9%	7.1%	2.2%
Middle	140	73.7%	76.8%	74.1%	74.8%	31	16.3%	8.0%	11.9%	7.2%
Upper	19	10.0%	6.6%	10.4%	10.7%	113	59.5%	68.7%	63.9%	71.3%
Unknown	0	0.0%	0.0%	0.2%	0.3%	20	10.5%	20.1%	15.3%	19.0%
<b>Total</b>	<b>190</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>190</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	<b>#</b>	<b>Bank</b>			<b>Aggregate</b>					
		<b>%</b>	<b>% \$(000s)</b>		<b>%</b>	<b>% \$(000s)</b>				
Low	0	0.0%	0.0%		0.0%	0.0%				
Moderate	32	19.8%	16.2%		18.4%	15.6%				
Middle	106	65.4%	71.7%		63.8%	73.2%				
Upper	24	14.8%	12.1%		14.0%	11.1%				
Unknown	0	0.0%	0.0%		0.0%	0.0%				
Tract Unknown	0	0.0%	0.0%		3.9%	0.1%				
<b>Total</b>	<b>162</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				
<b>By Revenue</b>										
\$1 Million or Less	137	84.6%	79.3%		77.8%	79.7%				
<b>By Loan Size</b>										
\$100,000 or less	152	93.8%	50.1%		94.2%	53.3%				
\$100,001-\$250,000	3	1.9%	6.1%		1.9%	7.0%				
\$250,001-\$1 Million	7	4.3%	43.7%		3.9%	39.7%				
<b>Total</b>	<b>162</b>	<b>100.0%</b>	<b>100.0%</b>		<b>100.0%</b>	<b>100.0%</b>				

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Non MSA B

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	5	2.7%	2.4%	9.3%	8.3%	3	1.6%	0.7%	2.9%	1.6%
Middle	98	53.8%	45.6%	48.4%	44.0%	21	11.5%	8.2%	18.0%	14.8%
Upper	79	43.4%	51.9%	41.9%	47.2%	67	36.8%	43.9%	63.3%	69.0%
Unknown	0	0.0%	0.0%	0.3%	0.4%	91	50.0%	47.2%	15.8%	14.5%
<b>Total</b>	<b>182</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>182</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.2%	0.1%
Moderate	1	0.9%	0.6%	4.6%	4.4%	1	0.9%	0.5%	1.2%	0.8%
Middle	50	42.7%	38.3%	46.0%	41.6%	4	3.4%	1.9%	5.1%	3.1%
Upper	66	56.4%	61.1%	49.4%	54.0%	74	63.2%	68.1%	59.1%	64.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	38	32.5%	29.4%	34.5%	31.3%
<b>Total</b>	<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	0.6%	0.1%	0.9%	0.1%
Moderate	10	5.6%	1.5%	5.0%	1.1%	23	13.0%	3.7%	11.0%	3.0%
Middle	114	64.4%	49.8%	61.0%	44.9%	35	19.8%	8.3%	17.0%	5.6%
Upper	53	29.9%	48.7%	33.9%	54.0%	114	64.4%	79.3%	69.3%	85.7%
Unknown	0	0.0%	0.0%	0.0%	0.0%	4	2.3%	8.7%	1.8%	5.6%
<b>Total</b>	<b>177</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>177</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	1	0.2%	0.0%	0.2%	0.0%
Moderate	16	3.4%	1.7%	6.7%	6.1%	27	5.7%	0.9%	3.4%	1.3%
Middle	262	55.0%	43.4%	49.4%	43.0%	60	12.6%	5.9%	12.4%	9.0%
Upper	198	41.6%	55.0%	43.8%	50.7%	255	53.6%	56.7%	62.5%	67.8%
Unknown	0	0.0%	0.0%	0.1%	0.2%	133	27.9%	36.4%	21.5%	21.9%
<b>Total</b>	<b>476</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>476</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	#	Bank %	% \$(000s)	%	Aggregate % \$(000s)					
Low	0	0.0%	0.0%	0.0%	0.0%					
Moderate	35	21.2%	24.1%	21.8%	18.1%					
Middle	77	46.7%	48.6%	43.5%	55.1%					
Upper	53	32.1%	27.3%	27.8%	25.9%					
Unknown	0	0.0%	0.0%	0.0%	0.0%					
Tract Unknown	0	0.0%	0.0%	6.9%	0.9%					
<b>Total</b>	<b>165</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					
<b>By Revenue</b>										
\$1 Million or Less	128	77.6%	47.9%	70.4%	53.6%					
<b>By Loan Size</b>										
\$100,000 or less	156	94.5%	61.1%	91.2%	48.8%					
\$100,001-\$250,000	7	4.2%	16.7%	6.9%	24.5%					
\$250,001-\$1 Million	2	1.2%	22.2%	1.9%	26.7%					
<b>Total</b>	<b>165</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>					

Originations and Purchases

**2012 Aggregate Comparison Loan Distribution Table**  
Assessment Area/Group: Non MSA C

Income Categories	HMDA									
	By Tract Income					By Borrower Income				
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
<b>Home Purchase</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	57.1%	75.0%	77.3%	82.2%	0	0.0%	0.0%	0.0%	0.0%
Upper	3	42.9%	25.0%	22.7%	17.8%	4	57.1%	79.9%	86.4%	92.6%
Unknown	0	0.0%	0.0%	0.0%	0.0%	3	42.9%	20.1%	13.6%	7.4%
<b>Total</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	3.8%	2.9%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	100.0%	100.0%	80.8%	90.3%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	11.5%	5.2%	3	100.0%	100.0%	73.1%	87.5%
Unknown	0	0.0%	0.0%	7.7%	4.5%	0	0.0%	0.0%	23.1%	9.5%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	4.2%	0.4%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	9.1%	2.7%	8.3%	1.4%
Middle	16	72.7%	64.3%	75.0%	80.9%	6	27.3%	8.9%	25.0%	4.7%
Upper	6	27.3%	35.7%	25.0%	19.1%	14	63.6%	88.5%	62.5%	93.4%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multi-Family</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Upper	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>	<b>0.0%</b>
<b>HMDA Totals</b>										
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	2.8%	1.5%
Moderate	0	0.0%	0.0%	0.0%	0.0%	2	6.3%	0.5%	2.8%	0.1%
Middle	23	71.9%	80.6%	77.8%	86.1%	6	18.8%	1.6%	8.3%	0.5%
Upper	9	28.1%	19.4%	19.4%	11.7%	21	65.6%	87.5%	73.6%	90.2%
Unknown	0	0.0%	0.0%	2.8%	2.2%	3	9.4%	10.4%	12.5%	7.7%
<b>Total</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>SMALL BUSINESS</b>										
<b>By Tract Income</b>										
	Bank		Aggregate			Bank		Aggregate		
	#	%	% \$(000s)	%	% \$(000s)	#	%	% \$(000s)	%	% \$(000s)
Low	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	33	68.8%	46.4%	60.6%	46.4%	6	60.6%	46.4%	60.6%	46.4%
Upper	15	31.3%	53.6%	22.5%	50.9%	3	22.5%	50.9%	22.5%	50.9%
Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
Tract Unknown	0	0.0%	0.0%	0.0%	0.0%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>By Revenue</b>										
\$1 Million or Less	38	79.2%	80.5%	60.6%	77.8%	10	20.8%	19.5%	39.4%	22.2%
<b>By Loan Size</b>										
\$100,000 or less	44	91.7%	45.3%	94.4%	48.2%	4	8.3%	54.7%	5.6%	51.8%
\$100,001-\$250,000	2	4.2%	12.1%	2.8%	11.5%	0	0.0%	0.0%	0.0%	0.0%
\$250,001-\$1 Million	2	4.2%	42.6%	2.8%	40.3%	0	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Originations and Purchases



