



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

November 26, 2001

Community Reinvestment Act Performance Evaluation

**Armed Forces Bank of California, N.A.
Charter Number: 23946**

**3280 Main Street, #7C
San Diego, CA 92113**

Office of the Comptroller of the Currency

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

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Overall CRA Rating

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

The following table indicates the performance level of **Armed Forces Bank of California, N.A. (AFBCA)** with respect to the lending, investment, and service tests:

Performance Levels	Armed Forces Bank of California, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Lending activity reflects good responsiveness to the primary credit needs of AFBCA's assessment area.
- AFBCA's distribution of consumer loans, its primary loan product, is excellent.
- AFBCA offers innovative and flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-military personnel, and has a positive impact on the Lending Test.
- AFBCA's community development lending is significant, based on the dollar volume, which has a positive impact on the Lending Test.
- AFBCA provides an excellent level of qualified investments, considering the limited opportunities for investments on military installations.
- The level of retail banking services provided to military personnel is excellent.

Definitions and Common Abbreviations

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

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

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the U.S. Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the U.S. Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten-year census and an average population of 4,000.

Community Development (CD) - Affordable 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 C.F.R. 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

Full-Scope Review - Performance under the lending, investment, and service tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area delineated by the U.S. Census Bureau in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA) - The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

Home Mortgage Loans - Such loans include 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.

Limited-Scope Review - Performance under the lending, investment, and service tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution).

Low-Income - Income levels that are less than 50 percent of the median family income.

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

Metropolitan Statistical Area (MSA) - Area defined by the director of the U.S. Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80 percent and less than 120 percent of the MFI.

Moderate-Income - Income levels that are at least 50 percent and less than 80 percent of the MFI.

Small Loans to Businesses - Loans with original amounts of \$1 million or less that are: (1) secured by non-farm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Loans to Farms - Loans with original amounts of \$500,000 or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120 percent or more of the MFI.

Description of Institution

Armed Forces Bank of California (AFBCA), an intrastate bank, is headquartered in San Diego, California. AFBCA is a wholly owned subsidiary of Dickinson Financial Corporation (DFC), a \$3.3 billion multi-bank holding company headquartered in Kansas City, Missouri. As of September 30, 2001, AFBCA reported total assets of \$13 million. AFBCA has two bank locations inside the Naval Station military installation in San Diego, California. The main bank opened on October 25, 1999, and is not on a military base. The two branches on the installation opened May 3, 2001.

AFBCA is a full service institution offering various loan and deposit products. The bank's primary business strategy is to serve the needs of current and former military personnel throughout the world. The primary loan product for AFBCA is non real-estate consumer loans, which is consistent with the primary credit need in military communities. AFBCA specializes in providing banking services on military installations.

As of September 30, 2001, net loans represented 74 percent of total assets. Consumer loans, commercial loans, and HMDA loans represent 76 percent, 15 percent, and 9 percent of the number of loans originated during the evaluation period, respectively. By dollar volume, commercial loans are 66 percent, HMDA loans are 31 percent, and consumer loans are 3 percent of loans originated during this same time frame. A majority of commercial and HMDA loans represent purchases from other financial institutions.

Real estate loans represent 99 percent of the total dollar amount of loans outstanding, with consumer and other loan categories representing less than 1 percent. Tier 1 capital is \$7 million, which represents 54 percent of total assets.

No legal, financial, or other factors impede AFBCA's ability to help meet the credit needs of its assessment area. This is AFBCA's first CRA evaluation.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test (except CD loans) is October 25, 1999 through September 30, 2001. For CD loans, the Investment Test, and the Service Test, the evaluation period is October 25, 1999 to November 26, 2001.

For the lending test, we evaluated consumer loans as they represent a substantial majority of the bank's business. In addition, the primary credit need of military personnel is consumer loans.

The bank only originated/purchased six HMDA loans and one small business loan. Due to the extremely low volume, an analysis of HMDA and small business loan performance is not meaningful. HMDA loans are not a primary credit need, and there are no small business loan opportunities on military installations.

Data Integrity

As part of the CRA evaluation, AFBCA's publicly filed information on HMDA and small business loans was tested for accuracy. We also tested the accuracy of consumer loan data submitted during the examination for consideration. The test included an evaluation of the bank's processes to ensure data is reliable.

Significant errors were found in the small business loan data; however, corrections were made during the examination. All data used to reach conclusions regarding the bank's CRA performance was accurate.

Information regarding CD loans, investments, and services was evaluated during the examination.

Selection of Areas for Full-Scope Review

The bank's entire assessment area received a full-scope review since it is not defined by geography.

AFBCA defines its assessment area as all active or reserve military personnel and their dependents, retired military personnel, persons enrolled in military academies, and persons participating in college ROTC programs throughout the world. The CRA regulation allows this option to banks whose business predominantly consists of serving the needs of military personnel or their dependents who are not located within a defined geographic area.

Ratings

The bank's overall rating is based on its performance in the entire assessment area.

Ratings are assigned to the bank as a whole, with emphasis placed on loans to current and former military personnel. Emphasis is also placed on consumer loan products. HMDA and small business loans are not considered in this evaluation due to the extremely low number of loans and the fact that these products do not represent a credit need in the assessment area.

Other

We conducted one community contact during the evaluation with a community-based development organization that serves military personnel and their families in the San Diego area. The contact identified the primary credit need as affordable rental housing. Another primary need in the military community is education on how to manage debt. Community development opportunities are extremely limited as most needs are provided and controlled by the government.

Fair Lending Review

An analysis of two years of public comments and consumer complaint information, HMDA, and small business lending data was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in its defined assessment area is good.

Lending Activity

Refer to Table 1 in appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity reflects good responsiveness to the primary credit needs of AFBCA's assessment area. Consumer credit is the most important credit need of military personnel and is weighed most heavily in evaluating the bank's CRA performance. A majority of AFBCA's customers are young, enlisted soldiers whose income is in the low- and moderate-income categories.

Since AFBCA defines its community as all active, reserve, and retired military personnel throughout the world, the deposit market rank and market share are not applicable. AFBCA's total volume of lending is high, with a net loan to deposit ratio of 392 percent as of September 30, 2001. A majority of this dollar volume of loans consists of purchased commercial and real estate loans. A significant portion of the commercial loans purchased by AFBCA does not qualify under the small business loan category. The net loan to deposit ratio is 77 percent if purchased loans are deducted.

Factors that affect AFBCA's operations are:

- Access on the Naval Station is closed to the public (only assigned persons or those having official business on the installation have access).
- The distribution of promotional materials and the use of outdoor signs for advertising are restricted. Marketing efforts are further hampered since it is difficult to obtain accurate mailing list for military persons.
- Post exchanges provide unsecured lines of credit up to \$5 thousand at the Naval Station.
- Based on comments provided by bank management, strong competition is provided by credit unions on military installations. Credit unions are the "accepted financial institution" for military personnel and this philosophy is communicated to incoming service members. It is difficult for the AFBCA to compete with rates and terms on motor vehicle loans offered by these credit unions.

The number of loans is small. AFBCA did not have full access to its customer base until branches were opened on the Naval Station in May 2001. Since this time, the number of deposit accounts has increased significantly. AFBCA had 155 accounts on December 31, 2000 compared to 718 accounts on October 31, 2001.

HMDA and small business loans are not a primary credit need. Housing and/or a housing allowance are provided by the military to enlisted personnel. There are no small business loan opportunities on military installations.

Distribution of Loans by Income Level of the Geography

An analysis of the geographic distribution of loans is not meaningful since the bank's community is not defined by geography.

AFBCA makes a majority of the number of its loans in its assessment area. For all loans combined, 82 percent by number and 16 percent by dollar volume are made to military personnel. The dollar volume of loans to the military is low and affected by the fact that the bank's primary loan product, consumer loans, has lower dollar amounts. There were no small business loans made to military personnel. For other loan categories:

- 91 percent of the number and 84 percent of the dollar volume of consumer loans are made to military personnel.
- 17 percent of the number and 13 percent of the dollar volume of HMDA loans are made to military personnel.

Distribution of Loans by Income Level of the Borrower

The distribution of consumer loans by income level of borrower is excellent. Consumer loans are the primary product for AFBCA.

Home Mortgage Loans

An analysis of HMDA loans is not meaningful due to the low number of originated or purchased loans and the fact that HMDA loans are not a significant credit need for the assessment area.

Small Loans to Businesses

An analysis of small loans to businesses is not meaningful due to the low number of originated or purchased loans and the fact that there are no small business loan opportunities on military installations.

Consumer Loans

Refer to Table 13 in appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

AFBCA's distribution of consumer loans is excellent. The number of loans originated is small. However, AFBCA has only had full access to its customer base for six months when branches were opened on the Naval Station. Since opening the Naval Station branches, the number of deposit account customers has increased significantly.

A majority of the bank's consumer loans are to low-income individuals. Performance to low-income military personnel significantly exceeds demographics. While the percentage of loans made to moderate-income individuals is below demographics, performance is good considering the strong competition provided by credit unions on military installations.

AFBCA showed strong penetration to low-income borrowers in unsecured consumer loan products. This product helps young enlisted personnel establish credit. Through an affiliate of AFBCA, applicants with no credit history and minimal income can obtain a credit card with a limit as low as \$300.

Community Development Lending

Refer to Table 1 in appendix D for the facts and data used to evaluate the bank's level of community development lending.

CD lending performance is good given the extremely limited opportunities available to make CD loans on military installations. During the evaluation period, AFBCA made one CD loan totaling \$866 thousand, which is 12 percent of Tier 1 capital. This is a multi-family loan to finance construction of housing barracks at Fort Sill, Oklahoma, an U.S. Army training base. The barracks will provide housing for basic trainees and other enlisted troops. While not considered innovative or complex, this loan helps meet the need for affordable housing to low- and moderate-income military personnel.

Product Innovation and Flexibility

AFBCA makes use of innovative and flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income military personnel. AFBCA offers the following products:

STARTER LOANS:

This flexible loan product primarily benefits new recruits with little or no credit history. New recruits are predominantly low- and moderate-income individuals. This product helps them establish credit history, which is a primary credit need. The borrower receives a \$500 unsecured loan with a six-month term. The interest rate is the same as the bank's regular unsecured loan rate offered to customers with good credit history. To qualify, the applicant must maintain a direct deposit account with the bank for a minimum of sixty days with no return items. The applicant must also have a total debt to income ratio of 41 percent or below. During the evaluation period, AFBCA made 38 loans totaling \$24 thousand.

READY RESERVE LOANS:

This is a flexible loan product. It not only offers overdraft protection, but also provides a convenient and economical way to borrow money. The primary benefit is to low- and moderate-income individuals, which is a majority of the bank's deposit customer base. Under this program, customers obtain a pre-approved line of credit at a competitive interest rate and a minimal annual fee of \$18. Funds are automatically transferred from the line of credit to the deposit account when overdrafts occur. Customers can also transfer money from the line of credit to their deposit account by phone. Loan payments are automatically deducted from deposit accounts. AFBCA does not track performance on this loan product.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

AFBCA's performance under the investment test is rated "Outstanding". Based on full-scope reviews, the bank's performance in its defined assessment area is excellent.

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

AFBCA provides an excellent level of qualified investments, despite limited opportunities for investments that primarily benefit military personnel and are responsive to assessment area needs.

Opportunities for investments are severely limited on military installations because the government provides housing and all required services for military personnel, including maintenance and the upkeep of those services. A majority of the community development opportunities in AFBCA's assessment area are through donations, grants, or in-kind contributions to established organizations.

During the evaluation period, AFBCA's investments totaled in excess of \$198 thousand, representing 2.9 percent of Tier 1 capital. The bank invested more than \$2.6 thousand to an organization that supports low- and moderate-income military families through its support of scholarships and youth-oriented activities.

Due to limited qualified investment opportunities, AFBCA, in its quest to provide more assistance to low- and moderate-income individuals, searched for investment opportunities in areas located near bank locations that also serve the military population. As a result, AFBCA invested \$100 thousand in a CRA Qualified Investment Fund. This fund was initiated nationwide in June 1999 and is a complex, innovative concept that allows geographical areas with a limited supply of qualified investments to purchase shares in a CRA-dedicated mutual fund. The fund allows banks to specify direct underlying securities located in its assessment area.

Through the CRA Qualified Investment Fund, AFBCA invested in two municipal bonds that help fund a redevelopment project and provide loans to low- and moderate-income individuals. These bonds benefit the city of San Diego, California, where AFBCA is located. San Diego has a significant military population that includes residents of the San Diego Naval Station, Miramar Naval Air Station, Camp Pendleton, Marine Corps Recruit Depot, Naval Medical Center, Naval Submarine Base, Naval Air Station North Island, Naval Amphibious Base, Naval Landing Field Imperial Beach, and the Fleet Anti-Sub Warfare Training Center. Specific municipal bond investments include:

- \$50 thousand to finance the Centre City Redevelopment Project. This bond issue supports job creation, affordable housing, and urban development.
- \$50 thousand in a targeted mortgage-backed security comprised of loans made to low- and moderate-income borrowers. Loans were originated in 1999 and 2000. All loans are made to low- and moderate-income families.

In addition, AFBCA made a \$95 thousand contribution to a Community Development Financial Institution (CDFI) in San Diego. The primary mission of a CDFI is to promote community development. As stated above, San Diego has a significant military population.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Outstanding". Based on full-scope reviews, the bank's performance in its defined assessment area is excellent.

Retail Banking Services

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

AFBCA's performance in providing retail-banking services is excellent. According to Military Personnel Statistics dated February 2001, 84 percent of military personnel are enlisted.

AFBCA has tailored its services to fit the needs of military personnel. They offer products and services that allow their depositors extensive account access, extended banking hours, 24-hour customer service, and other benefits specifically designed for military personnel.

AFBCA's delivery systems are very accessible to essentially all of its military customers, with two branches located on the Naval Station in San Diego, California. The Naval Station primarily serves individuals in the military. All bank locations are in low-income census tracts.

Hours of operation and services offered are excellent. Branches on the Naval Station are open seven days a week, including holidays. The exchange branch opens at 9:00 a.m. daily, and closes at 9:00 p.m. on weekdays and at 7:00 p.m. on weekends. The fleet store branch opens at 8:00 a.m. and closes at 7:00 p.m. on weekdays. On weekends, the fleet store branch hours are from 9:00 a.m. to 4:00 p.m.

AFBCA has a network of thirteen ATM's, of which none accept deposits. The ATM's are located on the Naval Station San Diego and Naval Air Station North Island. These military installations accommodate both Navy and Marine personnel. The need for deposit taking ATMs is limited since all military pay requires direct deposit. Both AFBCA and affiliate bank customers can use these ATMs at no charge. Customers can make deposits and send applications by mail.

AFBCA provides a full-service Web Site that allows users access to all bank services. Customers can open accounts, view account statements, transfer funds, and communicate with the customer service department. They can also apply for loans, an ATM/debit card, and a credit card. In most situations, the military provides Internet access to its personnel. The web site and online banking service is especially helpful to service members who are stationed on ships and overseas.

AFBCA offers Telebanc, a toll-free phone number, available 24 hours a day, seven days a week, and accessible wherever a customer is stationed in the United States. There is no charge for this service, which allows customers to review account balances, check deposits and account activity, transfer funds between accounts, make loan payments, fax statements, check rates, and much more. In addition, toll-free numbers are also available for customers in Germany and Korea.

AFBCA offers a customer service program that allows customers to have personal contact with a customer service representative to solve problems and answer questions. This service is especially helpful to military personnel stationed overseas and in different time zones. Enlisted personnel initiate a majority of the calls received. The call center is open 24 hours a day, seven days a week.

Community Development Services

AFBCA's performance in providing CD services is good considering its asset size and the length of time the bank has been open. Also, AFBCA did not have full access to its customer base until May 2001.

AFBCA provides the following community development services through its employees:

- Financial advice to an organization that assists junior enlisted personnel and their families, who are primarily low- and moderate-income individuals.
- Fundraising assistance to an organization that raises funds to support college scholarships for needy military family members.
- Financial advice to an organization that sponsors programs benefiting low-income children.

AFBCA offers a low-cost checking account and debit card. Direct deposit customers are allowed to open checking accounts with a zero balance. The account has no monthly service charges or minimum balance requirements. There is also unlimited check writing privileges and overdraft assistance provided. Debit cards are available at no charge. Currently, 942 customers take advantage of this service.

At branch locations, AFBCA will cash government checks at no charge for both customers and non-customers in amounts up to \$500.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered.

Time Period Reviewed	Lending Test (excludes CD Loans): (10/25/99 to 09/30/01) Investment and Service Tests and CD Loans: (10/25/99 to 11/26/01)	
Financial Institution		Products Reviewed
Armed Forces Bank of California, National Association (AFBCA) San Diego, California		HMDA Loans Small Loans to Businesses Consumer Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Entire bank deposit customer base	Full-Scope	AFBCA defines its assessment area as all active or reserve military personnel and their dependents, retired military personnel, persons enrolled in military academies, and persons participating in college ROTC programs throughout the world. The assessment area is not limited to geography.

Appendix C: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Entire deposit customer base C-1

Demographic Information for Full-Scope Area: Entire deposit customer base						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	N/A	N/A	N/A	N/A	N/A	N/A
Population by Geography	N/A	N/A	N/A	N/A	N/A	N/A
Owner-Occupied Housing by Geography	N/A	N/A	N/A	N/A	N/A	N/A
Businesses by Geography	N/A	N/A	N/A	N/A	N/A	N/A
Farms by Geography	N/A	N/A	N/A	N/A	N/A	N/A
Family Distribution by Income Level	N/A	N/A	N/A	N/A	N/A	N/A
Distribution of Low- and Moderate-Income Families throughout AA Geographies	N/A	N/A	N/A	N/A	N/A	N/A
2001 U.S. military median household income **	\$33,226					

(*) Information by geography is not applicable since the bank's AA is not defined by geography.

(**) Source: Defense Finance and Accounting Service - Complete Active duty and Reserve Monthly Drill Pay Tables, effective January 1, 2001.

AFBCA defines its AA as “all locations of any current or former military personnel throughout the world” as allowed by the CRA regulation. This includes all active or reserve personnel and their dependents, retired personnel, persons enrolled in military academies, and persons participating in college ROTC programs throughout the world. The largest portion of the bank’s AA consists of enlisted military personnel.

The primary credit need in the military community is for non-real estate consumer loans. Military installations generally provide the basic necessities for their residents, including housing, retail sales, and medical aid. Military families living outside the installation receive the same benefits plus housing and cost of living allowances.

Appendix D: Tables of Performance Data

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TABLES OF PERFORMANCE DATA.....D-5

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/assessment area. Tables without data are not included in this PE.

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

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

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

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MSA/assessment area.

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank’s assessment area. See Interagency Q&As__12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MSA/Assessment Area column and record the corresponding numbers and amounts in the “Qualified Investments” column.

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

Tables of Performance Data

Entire bank

Tables 2, 3, 4, 5, 6, 7, 8, 9, 10, 11 and 12 are not applicable. Therefore, they are not included in this section.

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Table 1. Lending Volume

LENDING VOLUME 2001		Geography: NOT APPLICABLE						Evaluation Period: OCTOBER 25, 1999 TO SEPTEMBER 30,				
MSA/Assessment Area (2001):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Entire bank deposit custom base	100.00	6	3,146	1	971	0	0	1	866	8	4,983	100.00

* Loan Data as of September 30, 2001. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From October 25, 1999 to November 26, 2001.

*** Deposit Data as of September 30, 2001. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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Table 1. Other Products

LENDING VOLUME 2001		Geography: NOT APPLICABLE						Evaluation Period: OCTOBER 25, 1999 TO SEPTEMBER 30,						
MSA/Assessment Area:	% of Rated Area	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
	Loans (#) in MA/AA*	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:														
Entire customer base	100.00	54	352	0	0	0	0	4	62	0	0	6	96	100.00

* Loan Data as of September 30, 2001. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is From October 25, 1999 to September 30, 2001.

*** Deposit Data as of September 30, 2001. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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Table 1. Other Products (continued)

LENDING VOLUME 2001		Geography: NOT APPLICABLE		Evaluation Period: OCTOBER 25, 1999 TO SEPTEMBER 30,	
MSA/Assessment Area:	Other Unsecured Consumer Loans		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
Entire customer base	44	194	0	0	

* The evaluation period for Optional Product Line(s) is From October 25, 1999 to September 30, 2001.

Table 13. Geographic and Borrower Distribution of Consumer Loans

Geographic and Borrower Distribution: CONSUMER LOANS SEPTEMBER 30, 2001		Geography: NOT APPLICABLE										Evaluation Period: OCTOBER 25, 1999 TO								
MSA/Assessment Area:	Geographic Distribution ***										Borrower Distribution									
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers			
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of military Hhlds*	% of BANK Loans	% of military Hhlds*	% of BANK Loans	% of military Hhlds*	% of BANK Loans	% of military Hhlds*	% of BANK Loans		
Full Review:																				
Entire customer base	54	100.00	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.30	64.15	39.70	18.87	31.40	3.77	23.50	13.21

* Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area with income information available. No information was available for 1.85% of loans originated and purchased by bank.

** Percentage of Households is based on the Defense Finance and Accounting Service - Complete Active Duty and Reserve Monthly Drill Pay Tables, effective January 1, 2001.

*** Geographic distribution is not applicable since the bank's AA is not defined by geography.

NATIONAL ASSOCIATION

Table 14. Qualified Investments

QUALIFIED INVESTMENTS 2001		Geography: NOT APPLICABLE				Evaluation Period: OCTOBER 25, 1999 TO NOVEMBER 8,			
MSA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Entire customer base	0	0	7	198	7	198	100.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: NOT APPLICABLE				Evaluation Period:			
OCTOBER 25, 1999 TO SEPTEMBER 30, 2001																	
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography *			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Entire customer base	100.00	3	100.00	100.00	0.00	0.00	0.00	3	0	3	0	0	0	N/A	N/A	N/A	N/A

* Percentage of population is based on 1990 Census information. Information is not applicable for this bank since its AA is not defined by geography.

