



**NEW YORK STATE BANKING DEPARTMENT  
CONSUMER SERVICES DIVISION**  
One State Street  
New York, NY 10004

**PUBLIC SUMMARY**

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

**Date of Evaluation:** December 31, 2005

**Institution:** Banco Popular North America  
9600 West Bryn Mawr  
Rosemont, Illinois 60018

**Note:** This evaluation is not an assessment of the financial condition of this institution. The rating assigned does not represent an analysis, conclusion or opinion of the New York State Banking Department concerning the safety and soundness of this financial institution.

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## **GENERAL INFORMATION**

This document is an evaluation of the Community Reinvestment Act (“CRA”) performance of Banco Popular North America’s (“BPNA”) New York operations (“BPNA-NY”) prepared by the New York State Banking Department. The evaluation represents the Banking Department’s current assessment and rating of BPNA-NY’s CRA performance based on an evaluation conducted as of December 31, 2005.

Section 28-b of the New York State Banking Law, as amended, requires that when evaluating certain applications, the Superintendent of Banks shall assess a banking institution’s record of helping to meet the credit needs of its entire community, including low and moderate-income (“LMI”) areas, consistent with safe and sound operations.

Part 76 of the General Regulations of the Banking Board implements Section 28-b and further requires that the Banking Department assess the CRA performance records of regulated financial institutions. Part 76 establishes the framework and criteria by which the Department will evaluate the performance. Section 76.5 further provides that the Banking Department will prepare a written report summarizing the results of such assessment and will assign to each institution a numerical CRA rating based on a 1 to 4 scoring system. The numerical scores represent an assessment of CRA performance as follows:

- (1) outstanding record of meeting community credit needs;
- (2) satisfactory record of meeting community credit needs;
- (3) needs to improve record of meeting community credit needs; and
- (4) substantial noncompliance in meeting community credit needs.

Section 76.5 further requires that the CRA rating and the written summary be made available to the public (“Evaluation”). Evaluations are primarily based on a review of performance tests and standards described in Section 76.7 and detailed in Sections 76.8 – 76.13. The tests and standards incorporate the 12 assessment factors contained in Section 28-b of the New York State Banking Law.

For explanation of technical terms used in this report, please consult the **GLOSSARY** at the back of this document.

## **OVERVIEW OF INSTITUTION'S PERFORMANCE**

### **Overall Rating**

BPNA-NY is rated "2," indicating a satisfactory record of helping to meet community credit needs.

### **Lending Test: "High Satisfactory"**

- During the evaluation period, BPNA-NY extended 1,928 HMDA-reportable or small business loans inside BPNA-NY's New York State assessment area. This reflects good responsiveness to community credit needs.
- During the evaluation period, a high percentage of BPNA-NY's HMDA-reportable loans and small business loans were extended inside the assessment area.
- The geographic distribution of BPNA-NY's loans reflects excellent penetration throughout the assessment area.
- The distribution of loans by borrowers' characteristics reflects excellent penetration among customers of different income levels, and good penetration among businesses of different sizes.
- BPNA-NY's use of flexible loan products is limited.
- BPNA-NY had \$127.4 million in qualified community development loans during the evaluation period. This represents an increase of about 98% over the previous evaluation's total. Approximately \$94 million comprises new money.

### **Investment Test: "High Satisfactory"**

- BPNA-NY had \$7.5 million in qualified community development investments. This included \$4.3 million in new commitments, which included \$3.2 million in qualified-mortgage backed securities.

### **Service Test: "Outstanding"**

- BPNA-NY delivery systems are readily accessible to all portions of the assessment area.
- BPNA-NY's record of opening and closing branches has not adversely affected the accessibility of its delivery systems particularly LMI geographies and/or LMI individuals.

- BPNA-NY's business hours and services are tailored to the convenience and needs of its assessment area, particularly LMI geographies and/or LMI individuals.
- BPNA-NY is a leader in providing qualified community development services.

This Evaluation was conducted based on a review of the 12 assessment factors set forth in Section 28-b of the New York State Banking Law and Part 76 of the General Regulations of the Banking Board.

## PERFORMANCE CONTEXT

### Institution's Profile:

BPNA, the largest Hispanic bank in the United States, was chartered by the New York State Banking Department on January 1, 1999. As of December 31, 2005, BPNA reported assets of \$12 billion and operated a network of 32 banking offices in New York State.

BPNA is a wholly owned subsidiary of Popular, Inc. ("PI"), a \$37.8 billion bank holding company headquartered in Puerto Rico. PI has operations in the United States, the Caribbean and Latin America. In addition to BPNA, PI operates Banco Popular de Puerto Rico, a \$25.7 billion institution domiciled in San Juan, Puerto Rico. In the United States, PI also operates Banco Popular, National Association, an \$84.7 million bank, headquartered in Orlando, Florida.

According to the latest available comparative deposit data, dated June 30, 2005, BPNA achieved a market share of 0.59% and ranked 19<sup>th</sup> among 120 deposit-taking institutions in its New York State assessment area. Of BPNA's approximately \$8.3 billion in deposits reported as of the same date, 34.8% were obtained in New York State.

The following table shows the distribution of BPNA's deposits in New York State as of June 30, 2005:

| <b>Banco Popular North America New York State Operations Deposit Market Share</b> |                             |                       |                           |                              |  |
|---|-----------------------------|-----------------------|---------------------------|------------------------------|--|
| <b>As of June 30, 2005</b>  |                             |                       |                           |                              |  |
| <b>County</b>   | <b>Deposits<br/>\$(000)</b> | <b>% of<br/>Total</b> | <b>Market<br/>Share %</b> | <b>Numerical<br/>Ranking</b> | <b>No. of Institutions in<br/>Area</b> |
| Bronx   | 277,232                     | 9.6                   | 2.78                      | 8                            | 22                                     |
| Kings   | 949,735                     | 32.8                  | 3.00                      | 9                            | 38                                     |
| New York  | 1,347,359                   | 46.5                  | 0.35                      | 19                           | 94                                     |
| Queens  | 251,331                     | 8.7                   | 0.69                      | 22                           | 45                                     |
| Westchester   | 69,670                      | 2.4                   | 0.25                      | 28                           | 35                                     |
| <b>Assessment Area</b>  | <b>2,895,327</b>            | <b>100.0</b>          | <b>0.59</b>               | <b>19</b>                    | <b>120</b>                             |

BPNA is primarily a commercial and residential real estate lender. As of December 31, 2005, 46.4% of BPNA's loan portfolio was commercial mortgages or commercial and industrial loans; 32.0% was 1-4 family residential or multifamily mortgages.

The following table illustrates BPNA's loan portfolios, based on Schedule RC-C of its 2003, 2004 and 2005 year-end Call Reports:

| <b>TOTAL GROSS LOANS OUTSTANDING</b>  |                  |              |                  |              |                  |              |
|---------------------------------------|------------------|--------------|------------------|--------------|------------------|--------------|
| <b>LOAN TYPE</b>                      | <b>2003</b>      |              | <b>2004</b>      |              | <b>2005</b>      |              |
|                                       | <b>(\$000)</b>   | <b>%</b>     | <b>(\$000)</b>   | <b>%</b>     | <b>(\$000)</b>   | <b>%</b>     |
| 1-4 Family Residential Mortgage Loans | 1,035,183        | 21.3         | 1,638,024        | 22.9         | 1,723,341        | 21.0         |
| Commercial Mortgage Loans             | 969,017          | 19.9         | 1,616,902        | 22.6         | 1,618,400        | 19.8         |
| Commercial and Industrial Loans       | 1,914,391        | 39.3         | 1,935,555        | 27.1         | 2,178,160        | 26.6         |
| Multifamily Mortgages                 | 80,179           | 1.6          | 871,043          | 12.2         | 903,776          | 11.0         |
| Consumer Loans                        | 447,371          | 9.2          | 596,266          | 8.3          | 649,220          | 7.9          |
| Construction Loans                    | 76,473           | 1.6          | 121,846          | 1.7          | 391,568          | 4.8          |
| Other Loans                           | 345,148          | 7.1          | 370,130          | 5.2          | 728,864          | 8.9          |
| <b>Total Gross Loans</b>              | <b>4,867,762</b> | <b>100.0</b> | <b>7,149,766</b> | <b>100.0</b> | <b>8,193,329</b> | <b>100.0</b> |

Since December 31, 2003, the date of the previous evaluation, BPNA's loan portfolio has increased 68.3%. The following table depicts the changes in the portfolio and shows the percentage of the total change attributed to each loan type:

| <b>Change In BPNA Gross Loans Outstanding from 2003 to 2005</b> |                  |                  |                  |                |                                  |
|---|------------------|------------------|------------------|----------------|----------------------------------|
| <b>LOAN TYPE</b>  | <b>2003</b>      | <b>2005</b>      | <b>Increase</b>  |                | <b>Percent of Total Increase</b> |
|   | <b>(\$000)</b>   | <b>(\$000)</b>   | <b>Amount</b>    | <b>Percent</b> |                                  |
| 1-4 Family Residential Mortgage Loans                           | 1,035,183        | 1,723,341        | 688,158          | 66.5           | 20.7                             |
| Commercial Mortgage Loans                                       | 969,017          | 1,618,400        | 649,383          | 67.0           | 19.5                             |
| Commercial and Industrial Loans                                 | 1,914,391        | 2,178,160        | 263,769          | 13.8           | 7.9                              |
| Multifamily Mortgages   | 80,179           | 903,776          | 823,597          | 1,027.2        | 24.8                             |
| Consumer Loans  | 447,371          | 649,220          | 201,849          | 45.1           | 6.1                              |
| Construction Loans  | 76,473           | 391,568          | 315,095          | 412.0          | 9.5                              |
| Other Loans   | 345,148          | 728,864          | 383,716          | 111.2          | 11.5                             |
| <b>Total</b>  | <b>4,867,762</b> | <b>8,193,329</b> | <b>3,325,567</b> | <b>68.3</b>    | <b>100.0</b>                     |

For the purpose of this evaluation, BPNA management requested that HMDA-reportable loans originated in BPNA's New York State assessment area by affiliate, Banco Popular National Association, be included in the lending test and evaluated on a consolidated basis with BPNA-NY's HMDA-reportable loans.

BPNA-NY's most recent CRA evaluation, dated January 1, 2004, resulted in an overall rating of "1," indicating an outstanding record of helping to meet community credit needs.

## Assessment Area:

BPNA-NY's assessment area consists of Bronx, Kings (Brooklyn), New York (Manhattan), and Queens counties, in their entirety and 16 census tracts in Westchester County. The entire area, except for Westchester County, is within the geographic boundaries of the City of New York. The 16 census tracts in Westchester County comprise the City of New Rochelle. The assessment area is the same as at the previous evaluation.

According to the 2000 U.S. census, the assessment area contains 2,123 census tracts of which 15.2% are low-income, 28.4% are moderate-income, 30.2% are middle-income and 23.6% are upper-income. The following table shows the distribution of census tracts within the assessment area:

| Assessment Area Census Tract Characteristics |            |             |            |             |            |             |            |             |           |            |              |            |             |
|--|------------|-------------|------------|-------------|------------|-------------|------------|-------------|-----------|------------|--------------|------------|-------------|
| County                                       | Low        |             | Moderate   |             | Middle     |             | Upper      |             | N/A       |            | Total        | LMI        |             |
|  | #          | %           | #          | %           | #          | %           | #          | %           | #         | %          | #            | #          | %           |
| Bronx  | 132        | 37.2        | 98         | 27.6        | 65         | 18.3        | 46         | 13.0        | 14        | 3.9        | 355          | 230        | 64.8        |
| Kings  | 119        | 15.2        | 297        | 37.9        | 235        | 30.0        | 117        | 14.9        | 15        | 1.9        | 783          | 416        | 53.1        |
| Queens                                       | 12         | 1.8         | 148        | 22.0        | 310        | 46.1        | 185        | 27.5        | 18        | 2.7        | 673          | 160        | 23.8        |
| New York                                     | 60         | 20.3        | 59         | 19.9        | 24         | 8.1         | 144        | 48.6        | 9         | 3.0        | 296          | 119        | 40.2        |
| Westchester                                  | 0          | 0.0         | 0          | 0.0         | 7          | 43.8        | 8          | 50.0        | 1         | 6.3        | 16           | 0          | 0.0         |
| <b>Total</b>                                 | <b>323</b> | <b>15.2</b> | <b>602</b> | <b>28.4</b> | <b>641</b> | <b>30.2</b> | <b>500</b> | <b>23.6</b> | <b>57</b> | <b>2.6</b> | <b>2,123</b> | <b>925</b> | <b>43.6</b> |

The assessment area appears reasonable based upon the location of BPNA-NY's branches and lending patterns. There is no evidence that LMI areas are arbitrarily excluded.

## Demographic and Economic Data

Population and income data used in this report is based on the 2000 U.S. Census. Updated median family income figures are obtained from the Department of Housing and Urban Development ("HUD") estimates.

BPNA-NY's assessment area contains a population of 7.6 million, of which 11.8% are age 65 and over and 21.5% are 16 and under. The median family income in the area is about \$47 thousand and the updated HUD median family income is \$57 thousand for 2004 and approximately \$58 thousand for 2005.

There are 2.9 million households in the assessment area, of which 20.1% are living below the poverty level. There are 1.8 million families inside the assessment area, of which 31.6% are low-income, 16.9% are moderate-income, 17.0% are middle-income and 34.5% are upper-income.

BPNA-NY's assessment area contains approximately 3 million housing units, of which about one-third are 1-4 family units and two-thirds are multifamily units. Owner-occupied units constitute approximately 27% of the units. Of the owner-occupied units, 3.6% are located in low-income, 18.7% in moderate-income, 36.2% in middle-income and 41.5% in

upper-income census tracts.

The following is a listing of charts included on pages 3-6 and 3-7 depicting key population, family, household, housing, income and related demographic data for each county comprising BPNA-NY's assessment area:

Chart #1 - Population and Income Characteristics by County

Chart #2 - Housing Characteristics by County

### Business Demographics

In 2005, the assessment area contained 505 thousand businesses. Of these, 62.5% were businesses with annual revenues of \$1 million or less, 7.2% had annual revenues of more than \$1 million and 30.3% of the businesses did not report their annual revenues. Businesses operating with fewer than 50 employees represented 73.7% of the total, and 90.8% of the businesses operated from a single location.

In 2004, there were 477 thousand businesses inside the assessment area, of which 63.1% were operations with annual revenues of \$1 million or less, 7.6% had annual revenues of more than \$1 million and 29.3% of the businesses did not report their annual revenues. Of the businesses inside the assessment area, 74.3% employed fewer than 50 workers and 90.2% operated from a single location.

Please refer to the following chart for additional business demographics in the assessment area:

Chart #3 - Business Demographics by County

The following table depicts the distribution by industry type of the businesses operating inside the assessment area during 2005:

| Distribution of Businesses within Assessment Area By Industry Type (2005) |                      |              |              |              |              |              |
|---|----------------------|--------------|--------------|--------------|--------------|--------------|
| Industry Type   | Number Of Businesses | Bronx        | Kings        | New York     | Queens       | Westchester  |
|   |                      | % of Total   |
| Agriculture, Forestry & Fishing   | 1,568                | 0.3          | 0.3          | 0.2          | 0.4          | 2.0          |
| Mining  | 148                  | 0.0          | 0.0          | 0.0          | 0.0          | 0.1          |
| Construction  | 22,185               | 6.0          | 5.7          | 1.8          | 7.6          | 8.3          |
| Manufacturing   | 20,408               | 2.4          | 3.6          | 5.0          | 3.1          | 2.9          |
| Transportation, Communication   | 20,627               | 4.2          | 4.3          | 3.1          | 5.9          | 3.8          |
| Wholesale Trade   | 30,705               | 4.1          | 5.8          | 6.9          | 5.6          | 3.8          |
| Retail Trade  | 89,865               | 23.7         | 20.4         | 14.8         | 19.3         | 13.8         |
| Finance, Insurance & Real Estate  | 48,149               | 9.0          | 8.1          | 11.1         | 8.0          | 10.9         |
| Services  | 194,097              | 37.2         | 35.9         | 41.9         | 34.3         | 38.6         |
| Public Administration   | 2,979                | 0.7          | 0.5          | 0.7          | 0.5          | 0.4          |
| Non-Classified Establishments   | 74,164               | 12.3         | 15.6         | 14.4         | 15.3         | 15.6         |
| <b>Total</b>  | <b>504,895</b>       | <b>100.0</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b> |

### Unemployment Statistics

The following table shows annual unemployment rates for the counties included in the assessment area. Statewide rates are included for comparison.

| Unemployment Rates |           |       |       |          |        |             |
|--------------------|-----------|-------|-------|----------|--------|-------------|
| Year               | Statewide | Bronx | Kings | New York | Queens | Westchester |
| 2005               | 5.0       | 7.5   | 6.2   | 5.1      | 5.2    | 4.1         |
| 2004               | 5.8       | 9.1   | 7.6   | 6.2      | 6.3    | 4.5         |

**CHART # 1**

| <b>ASSESSMENT AREA POPULATION AND INCOME CHARACTERISTICS BY COUNTY</b> |                  |                 |             |                  |             |                           |               |                  |                             |             |                  |                |             |                 |             |                |             |                |             |                            |             |
|--|------------------|-----------------|-------------|------------------|-------------|---------------------------|---------------|------------------|-----------------------------|-------------|------------------|----------------|-------------|-----------------|-------------|----------------|-------------|----------------|-------------|----------------------------|-------------|
| <b>COUNTY</b>  | Total Population | Age 65 and over |             | Age 16 and less  |             | Median Family Income(MFI) | HUD MSA MFI   | # of Households  | # of HH below poverty level |             | Total Families   | Low income     |             | Moderate income |             | Middle income  |             | Upper income   |             | LMI families in LMI tracts |             |
|  |                  | #               | %           | #                | %           |                           |               |                  | #                           | %           |                  | #              | %           | #               | %           | #              | %           | #              | %           | #                          | %           |
| <b>Bronx</b>   | 1,332,650        | 133,948         | 10.1        | 356,895          | 26.8        | 33,099                    | 57,650        | 463,242          | 134,404                     | 29.0        | 317,248          | 133,175        | 42.0        | 58,715          | 18.5        | 51,854         | 16.3        | 73,504         | 23.2        | 163,697                    | 85.3        |
| <b>Kings</b>   | 2,465,326        | 282,658         | 11.5        | 587,575          | 23.8        | 39,349                    | 57,650        | 881,006          | 211,538                     | 24.0        | 588,870          | 211,549        | 35.9        | 103,997         | 17.7        | 99,118         | 16.8        | 174,206        | 29.6        | 233,373                    | 74.0        |
| <b>New York</b>  | 1,537,195        | 186,776         | 12.2        | 229,772          | 14.9        | 71,629                    | 57,650        | 739,167          | 123,037                     | 16.6        | 306,220          | 89,281         | 29.2        | 40,700          | 13.3        | 38,804         | 12.7        | 137,435        | 44.9        | 100,358                    | 77.2        |
| <b>Queens</b>  | 2,229,379        | 283,042         | 12.7        | 453,930          | 20.4        | 49,815                    | 57,650        | 782,646          | 110,462                     | 14.1        | 542,804          | 123,580        | 22.8        | 94,780          | 17.5        | 108,206        | 19.9        | 216,238        | 39.8        | 84,937                     | 38.9        |
| <b>Westchester**</b>   | 72,182           | 11,185          | 15.5        | 15,537           | 21.5        | 82,285                    | 57,650        | 26,235           | 2,986                       | 11.4        | 17,683           | 2,592          | 14.7        | 2,093           | 11.8        | 2,654          | 15.0        | 10,344         | 58.5        | 0                          | 0.0         |
| <b>TOTAL A/A*</b>  | <b>7,636,732</b> | <b>897,609</b>  | <b>11.8</b> | <b>1,643,709</b> | <b>21.5</b> | <b>47,439</b>             | <b>57,650</b> | <b>2,892,296</b> | <b>582,427</b>              | <b>20.1</b> | <b>1,772,825</b> | <b>560,177</b> | <b>31.6</b> | <b>300,285</b>  | <b>16.9</b> | <b>300,636</b> | <b>17.0</b> | <b>611,727</b> | <b>34.5</b> | <b>582,365</b>             | <b>67.7</b> |

\* Assessment Area \*\* Partial County

**CHART # 2**

| <b>ASSESSMENT AREA HOUSING CHARACTERISTICS BY COUNTY</b> |                     |                  |             |                   |             |                            |             |                                |            |                                |             |                                 |             |                                |             |                  |             |                          |            |
|--|---------------------|------------------|-------------|-------------------|-------------|----------------------------|-------------|--------------------------------|------------|--------------------------------|-------------|---------------------------------|-------------|--------------------------------|-------------|------------------|-------------|--------------------------|------------|
| COUNTY   | Total Housing Units | 1-4 family Units |             | Multifamily Units |             | Owner-Occupied Units (O-O) |             | O-O Units in Low-income Tracts |            | O-O Units in Mod-income Tracts |             | O-O Units in Midd-income Tracts |             | O-O Units in Upp-income Tracts |             | Rental Units     |             | Vacant/ Boarded-up Units |            |
|  |                     | #                | %           | #                 | %           | #                          | %           | #                              | %          | #                              | %           | #                               | %           | #                              | %           | #                | %           | #                        | %          |
| <b>Bronx</b>   | 490,659             | 133,164          | 27.1        | 357,495           | 72.9        | 90,522                     | 18.4        | 11,370                         | 12.6       | 20,802                         | 23.0        | 33,285                          | 36.8        | 25,066                         | 27.7        | 391,918          | 79.9        | 27,447                   | 5.6        |
| <b>Kings</b>   | 930,866             | 456,744          | 49.1        | 474,122           | 50.9        | 238,290                    | 25.6        | 13,368                         | 5.6        | 77,659                         | 32.6        | 92,885                          | 39.0        | 54,378                         | 22.8        | 670,996          | 72.1        | 50,139                   | 5.4        |
| <b>New York</b>  | 798,144             | 28,752           | 3.6         | 769,392           | 96.4        | 148,695                    | 18.6        | 3,881                          | 2.6        | 12,773                         | 8.6         | 7,108                           | 4.8         | 124,934                        | 84.0        | 616,053          | 77.2        | 59,500                   | 7.5        |
| <b>Queens</b>  | 817,250             | 495,075          | 60.6        | 322,175           | 39.4        | 334,894                    | 41.0        | 1,005                          | 0.3        | 43,101                         | 12.9        | 162,122                         | 48.4        | 128,633                        | 38.4        | 462,179          | 56.6        | 34,586                   | 4.2        |
| <b>Westchester**</b>                                     | 26,995              | 15,973           | 59.2        | 11,022            | 40.8        | 13,173                     | 48.8        | 0                              | 0.0        | 0                              | 0.0         | 3,293                           | 25.0        | 9,880                          | 75.0        | 13,465           | 49.9        | 806                      | 3.0        |
| <b>TOTAL A/A*</b>  | <b>3,063,914</b>    | <b>1,129,708</b> | <b>36.9</b> | <b>1,934,206</b>  | <b>63.1</b> | <b>825,574</b>             | <b>26.9</b> | <b>29,638</b>                  | <b>3.6</b> | <b>154,382</b>                 | <b>18.7</b> | <b>298,693</b>                  | <b>36.2</b> | <b>342,943</b>                 | <b>41.5</b> | <b>2,154,611</b> | <b>70.3</b> | <b>172,478</b>           | <b>5.6</b> |

\* Assessment Area \*\* Partial County

**CHART # 3**

| <b>BUSINESS DEMOGRAPHICS BY COUNTY (2004)</b> |                      |   |             |   |            |                                      |             |  |             |                                  |             |
|---|----------------------|---|-------------|---|------------|--------------------------------------|-------------|--|-------------|----------------------------------|-------------|
| COUNTY AND ASSESSMENT AREA(A/A)               | Number of Businesses | Businesses with Rev. of \$1 million or less |             | Businesses with Rev. of more than \$1 million |            | Businesses with no revenues reported |             | Businesses with less than 50 employees |             | Operating from a single location |             |
|   |                      | #   | %           | #   | %          | #                                    | %           | #                                      | %           | #                                | %           |
| Bronx   | 38,751               | 25,391                                      | 65.5        | 1,865   | 4.8        | 11,495                               | 29.7        | 28,775                                 | 74.3        | 35,601                           | 91.9        |
| Kings   | 108,807              | 72,127                                      | 66.3        | 5,368   | 4.9        | 31,312                               | 28.8        | 80,804                                 | 74.3        | 101,940                          | 93.7        |
| New York                                      | 220,439              | 132,311                                     | 60.0        | 23,072  | 10.5       | 65,056                               | 29.5        | 164,325                                | 74.5        | 190,968                          | 86.6        |
| Queens  | 103,066              | 67,271                                      | 65.3        | 5,460   | 5.3        | 30,335                               | 29.4        | 75,894                                 | 73.6        | 95,959                           | 93.1        |
| Westchester*                                  | 5,994                | 4,133                                       | 69.0        | 333   | 5.6        | 1,528                                | 25.5        | 4,623                                  | 77.1        | 5,600                            | 93.4        |
| <b>Total A/A</b>                              | <b>477,057</b>       | <b>301,233</b>                              | <b>63.1</b> | <b>36,098</b>                                 | <b>7.6</b> | <b>139,726</b>                       | <b>29.3</b> | <b>354,421</b>                         | <b>74.3</b> | <b>430,068</b>                   | <b>90.2</b> |

| <b>BUSINESS DEMOGRAPHICS BY COUNTY (2005)</b> |                      |   |             |   |            |                                      |             |  |             |                                  |             |
|---|----------------------|---|-------------|---|------------|--------------------------------------|-------------|--|-------------|----------------------------------|-------------|
| COUNTY AND ASSESSMENT AREA(A/A)               | Number of Businesses | Businesses with Rev. of \$1 million or less |             | Businesses with Rev. of more than \$1 million |            | Businesses with no revenues reported |             | Businesses with less than 50 employees |             | Operating from a single location |             |
|   |                      | #   | %           | #   | %          | #                                    | %           | #                                      | %           | #                                | %           |
| Bronx   | 42,180               | 27,461                                      | 65.1        | 1,886   | 4.5        | 12,833                               | 30.4        | 31,167                                 | 73.9        | 39,036                           | 92.5        |
| Kings   | 118,189              | 77,298                                      | 65.4        | 5,460   | 4.6        | 35,431                               | 30.0        | 87,018                                 | 73.6        | 111,365                          | 94.2        |
| New York                                      | 229,609              | 136,018                                     | 59.2        | 23,007  | 10.0       | 70,584                               | 30.7        | 169,569                                | 73.9        | 200,693                          | 87.4        |
| Queens  | 108,530              | 70,286                                      | 64.8        | 5,478   | 5.0        | 32,766                               | 30.2        | 79,604                                 | 73.3        | 101,508                          | 93.5        |
| Westchester *                                 | 6,387                | 4,313                                       | 67.5        | 338   | 5.3        | 1,736                                | 27.2        | 4,858                                  | 76.1        | 5,991                            | 93.8        |
| <b>Total A/A</b>                              | <b>504,895</b>       | <b>315,376</b>                              | <b>62.5</b> | <b>36,169</b>                                 | <b>7.2</b> | <b>153,350</b>                       | <b>30.4</b> | <b>372,216</b>                         | <b>73.7</b> | <b>458,593</b>                   | <b>90.8</b> |

\* Partial County

## **PERFORMANCE TESTS AND ASSESSMENT FACTORS**

*This evaluation entails a review of BPNA-NY's lending, investment and service activities within the assessment area as provided for in Parts 76.8, 76.9 and 76.10 of the General Regulations of the Banking Board. The evaluation covers years 2004 and 2005.*

The data relied on in this evaluation were derived from various sources. In addition to bank-specific loan information submitted by the institution, 2004 and 2005 aggregate data for HMDA-reportable and small business loans were obtained from the Federal Financial Examination Council ("FFIEC") and PCI Services, Inc. CRA Wiz, an external vendor.

### **I. Lending Test: "High Satisfactory"**

*BPNA-NY's lending performance was evaluated pursuant to the following criteria: (1) Lending Activity; (2) Assessment Area Lending; (3) Geographic Distribution; (4) Borrower Characteristics; (5) Community Development Lending and (6) Innovative or Flexible Lending Practices. Factors (1), (2), (3) and (4) above were analyzed based on BPNA-NY's HMDA-reportable and small business lending activity. For the purpose of this evaluation, each loan product received equal weight. To draw conclusions regarding performance levels, the level of lending based on the number of loans was the primary factor used. When deemed necessary, the level of lending based on dollar volume was also used.*

#### **Lending Activity: "High Satisfactory"**

BPNA-NY's lending activity within its assessment area reflects good responsiveness to community credit needs.

During the evaluation period, BPNA-NY extended 1,928 HMDA-reportable or small business loans within the assessment area. Included in this total are 317 HMDA-reportable loans generated by BPNA-NY's affiliate, Banco Popular National Association. Compared to the previous evaluation, the combined total of HMDA-reportable and small business loans increased approximately 9%. BPNA-NY's HMDA-reportable lending inside the assessment area declined by 40.6% since the previous evaluation while the number of small business loans BPNA-NY extended within the assessment area increased by 69%.<sup>1</sup>

#### **HMDA-Reportable Loans**

The following table shows the types of HMDA-reportable loans BPNA-NY extended inside the assessment area during the evaluation period:

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<sup>1</sup> Except where noted in this report, HMDA-reportable loans include activity of BPNA-NY and Banco Popular National Association.

| BPNA-NY's HMDA-Reportable Loan Distribution Based on Loan Purpose |            |                |               |               |                  |               |            |               |
|---|------------|----------------|---------------|---------------|------------------|---------------|------------|---------------|
| Year  | Total      |                | Loan Purpose  |               |                  |               |            |               |
|   |            |                | Home Purchase |               | Home Improvement |               | Refinance  |               |
|   | #          | (\$000)        | #             | (\$000)       | #                | (\$000)       | #          | (\$000)       |
| 2004  | 250        | 57,754         | 75            | 27,219        | 70               | 5,412         | 105        | 25,123        |
| 2005  | 326        | 71,366         | 99            | 27,609        | 119              | 12,713        | 108        | 31,044        |
| <b>Total</b>  | <b>576</b> | <b>129,120</b> | <b>174</b>    | <b>54,828</b> | <b>189</b>       | <b>18,125</b> | <b>213</b> | <b>56,167</b> |

The distribution of HMDA-reportable loans among the counties comprising the assessment area is reasonable in light of BPNA-NY's performance context. Of note, Queens County accounted for a significant amount of BPNA-NY's loans in relation to deposits. As of June 30, 2005, Queens County accounted for 8.7% of BPNA-NY's deposits compared to 26.3% of the dollar volume of its HMDA-reportable loans in 2004, and 48.6% of HMDA-reportable dollar volume in 2005.

The following table shows the distribution of BPNA-NY's HMDA-reportable loans by county and loan type:

| BPNA-NY's HMDA-Reportable Lending by County |            |               |             |               |            |              |               |              |
|---|------------|---------------|-------------|---------------|------------|--------------|---------------|--------------|
| County                                      | 2004       |               |             |               |            |              |               |              |
|   | 1-4 Family |               | Multifamily |               | Total      |              |               |              |
|   | #          | (\$000)       | #           | (\$000)       | #          | %            | (\$000)       | %            |
| Bronx                                       | 50         | 5,929         | 7           | 695           | 57         | 22.8         | 6,624         | 11.5         |
| Kings                                       | 48         | 7,901         | 23          | 11,844        | 71         | 28.4         | 19,745        | 34.2         |
| New York                                    | 30         | 7,748         | 5           | 8,158         | 35         | 14.0         | 15,906        | 27.5         |
| Queens                                      | 75         | 14,057        | 10          | 1,140         | 85         | 34.0         | 15,197        | 26.3         |
| Westchester                                 | 2          | 282           | 0           | 0             | 2          | 0.8          | 282           | 0.5          |
| <b>Total</b>                                | <b>205</b> | <b>35,917</b> | <b>45</b>   | <b>21,837</b> | <b>250</b> | <b>100.0</b> | <b>57,754</b> | <b>100.0</b> |
| County                                      | 2005       |               |             |               |            |              |               |              |
|   | #          | (\$000)       | #           | (\$000)       | #          | %            | (\$000)       | %            |
|   | Bronx      | 68            | 9,703       | 4             | 1,752      | 72           | 22.1          | 11,455       |
| Kings                                       | 91         | 16,989        | 8           | 3,407         | 99         | 30.4         | 20,396        | 28.6         |
| New York                                    | 23         | 3,865         | 1           | 650           | 24         | 7.4          | 4,515         | 6.3          |
| Queens                                      | 126        | 32,512        | 4           | 2,138         | 130        | 39.9         | 34,650        | 48.6         |
| Westchester                                 | 1          | 350           | 0           | 0             | 1          | 0.2          | 350           | 0.4          |
| <b>Total</b>                                | <b>309</b> | <b>63,419</b> | <b>17</b>   | <b>7,947</b>  | <b>326</b> | <b>100.0</b> | <b>71,366</b> | <b>100.0</b> |

### Small Business Loans

An analysis of BPNA-NY's lending patterns shows that its small business loan activity was concentrated in New York County, where 40.5% of the dollar volume of its small business loans was generated.

The following table depicts the distribution of BPNA-NY's small business loans by county in the assessment area:

| BPNA-NY's Small Business Lending Activity by County |            |                |            |               |              |              |                |              |
|---|------------|----------------|------------|---------------|--------------|--------------|----------------|--------------|
| County  | 2004       |                | 2005       |               | Total        |              |                |              |
|   | #          | \$             | #          | \$            | #            | %            | \$             | %            |
| Bronx   | 73         | 12,997         | 74         | 4,154         | 147          | 10.9         | 17,151         | 7.0          |
| Kings   | 237        | 32,735         | 198        | 23,008        | 435          | 32.2         | 55,743         | 22.9         |
| New York  | 294        | 78,669         | 151        | 19,935        | 445          | 32.9         | 98,604         | 40.5         |
| Queens  | 178        | 33,521         | 140        | 37,164        | 318          | 23.5         | 70,685         | 29.0         |
| Westchester   | 4          | 754            | 3          | 750           | 7            | 0.5          | 1,504          | 0.6          |
| <b>Total</b>  | <b>786</b> | <b>158,676</b> | <b>566</b> | <b>85,011</b> | <b>1,352</b> | <b>100.0</b> | <b>243,687</b> | <b>100.0</b> |

**Assessment Area Concentration: "High Satisfactory"**

Overall, a high percentage of BPNA-NY's loans were extended within its assessment area. This reflects an adequate assessment area concentration of HMDA-reportable loans and an excellent concentration of small business loans.

The analysis of assessment area concentration does not include loans reported by BPNA-NY's affiliate, Banco Popular National Association. In accordance with section 76.8(c)(3) of the General Regulations of the Banking Board, affiliate lending is not considered in evaluating a bank's record of lending inside its assessment area.

The following table shows the distribution of BPNA-NY's HMDA-reportable and small business loans extended inside and outside the assessment area during the evaluation period:

| Distribution of BPNA-NY's Loans Inside and Outside of the Assessment Area |                 |             |            |             |              |                |             |               |             |                |
|---|-----------------|-------------|------------|-------------|--------------|----------------|-------------|---------------|-------------|----------------|
| Type  | Number of Loans |             |            |             | Total        | Dollar Amount  |             |               |             | Total          |
|   | Inside          |             | Outside    |             |              | Inside         |             | Outside       |             |                |
|   | #               | %           | #          | %           |              | (\$000)        | %           | (\$000)       | %           |                |
| HMDA-Reportable   |                 |             |            |             |              |                |             |               |             |                |
| 2004  | 99              | 72.3        | 38         | 27.7        | 137          | 28,961         | 83.4        | 5,783         | 16.6        | 34,744         |
| 2005  | 160             | 54.6        | 133        | 45.4        | 293          | 25,712         | 47.8        | 28,030        | 52.2        | 53,742         |
| <b>Subtotal</b>   | <b>259</b>      | <b>60.2</b> | <b>171</b> | <b>39.8</b> | <b>430</b>   | <b>54,673</b>  | <b>61.8</b> | <b>33,813</b> | <b>38.2</b> | <b>88,486</b>  |
| Small Business  |                 |             |            |             |              |                |             |               |             |                |
| 2004  | 786             | 89.6        | 91         | 10.4        | 877          | 158,676        | 88.3        | 21,017        | 11.7        | 179,693        |
| 2005  | 566             | 90.1        | 62         | 9.9         | 628          | 85,011         | 86.3        | 13,440        | 13.7        | 98,451         |
| <b>Subtotal</b>   | <b>1,352</b>    | <b>89.8</b> | <b>153</b> | <b>10.2</b> | <b>1,505</b> | <b>243,687</b> | <b>87.6</b> | <b>34,457</b> | <b>12.4</b> | <b>278,144</b> |
| <b>Total</b>  | <b>1,611</b>    | <b>83.3</b> | <b>324</b> | <b>16.7</b> | <b>1,935</b> | <b>298,360</b> | <b>81.4</b> | <b>68,270</b> | <b>18.6</b> | <b>366,630</b> |

## **Geographic Distribution of Loans:<sup>2</sup> “Outstanding”**

The geographic distribution of loans reflects, given the product lines evaluated, excellent penetration throughout the assessment area.

During the evaluation period, 45.8% of BPNA-NY’s HMDA-reportable loans were extended inside LMI census tracts. For small business loans, BPNA-NY’s LMI-area penetration ratio was 51.4%. These ratios significantly outperform the aggregate and indicate BPNA-NY’s commitment to helping meet the credit needs of all areas of the community.

The market aggregate’s penetration ratio for HMDA-reportable loans inside LMI census tracts was 29.8%. For small business loans, the aggregate’s LMI-area penetration ratio was 27.2%.

### HMDA-Reportable Loans

BPNA-NY has an excellent penetration of HMDA-reportable loans inside LMI census tracts.

In 2004, BPNA-NY extended 8.0% of its HMDA-reportable loans inside low-income census tracts. In moderate-income areas, BPNA-NY’s distribution of HMDA-reportable loans was 32.4%. BPNA-NY’s penetration of HMDA-reportable loans inside LMI census tracts exceeded the market aggregate’s performance in these areas.

In 2005, BPNA-NY continued to demonstrate strength in lending inside LMI communities with 13.2% of its HMDA-reportable loans in low-income census tracts. In moderate-income areas, BPNA-NY’s lending increased to 36.8%. BPNA-NY’s lending inside LMI areas was better than the market aggregate’s performance by wide margins.

The following table illustrates the distribution of HMDA-reportable loans by geography income level inside the assessment area during the evaluation period.

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<sup>2</sup> For additional details regarding geographic distribution of loans, refer to Section 5. For HMDA-reportable loans, refer to Exhibits 5-1 through 5-4. For small business loans, refer to exhibits 5-7 and 5-8.

| Distribution of HMDA-Reportable Loans by Geography Income Level* |            |              |                |              |                |              |                   |              |
|--|------------|--------------|----------------|--------------|----------------|--------------|-------------------|--------------|
| Geography<br>Income Level  | 2004       |              |                |              |                |              |                   |              |
|  | BPNA-NY    |              |                |              | Aggregate      |              |                   |              |
|  | #          | %            | (\$000)        | %            | #              | %            | (\$000)           | %            |
| Low  | 20         | 8.0          | 1,665          | 2.9          | 8,353          | 6.1          | 2,961,541         | 6.6          |
| Moderate   | 81         | 32.4         | 16,736         | 29.0         | 30,840         | 22.6         | 9,360,694         | 21.0         |
| Middle   | 86         | 34.4         | 22,083         | 38.2         | 47,917         | 35.0         | 12,869,374        | 28.8         |
| Upper  | 63         | 25.2         | 17,270         | 29.9         | 49,394         | 36.1         | 19,325,337        | 43.3         |
| N/A  | 0          | 0.0          | 0              | 0.0          | 252            | 0.2          | 130,369           | 0.3          |
| <b>Subtotal</b>  | <b>250</b> | <b>100.0</b> | <b>57,754</b>  | <b>100.0</b> | <b>136,756</b> | <b>100.0</b> | <b>44,647,315</b> | <b>100.0</b> |
| Geography<br>Income Level  | 2005       |              |                |              |                |              |                   |              |
|  | BPNA-NY    |              |                |              | Aggregate      |              |                   |              |
|  | #          | %            | (\$000)        | %            | #              | %            | (\$000)           | %            |
| Low  | 43         | 13.2         | 8,185          | 11.5         | 9,492          | 6.8          | 3,485,153         | 6.9          |
| Moderate   | 120        | 36.8         | 22,237         | 31.2         | 33,811         | 24.1         | 11,544,828        | 22.7         |
| Middle   | 113        | 34.7         | 26,750         | 37.5         | 50,926         | 36.3         | 14,759,852        | 29.1         |
| Upper  | 49         | 15.0         | 13,789         | 19.3         | 45,800         | 32.7         | 20,907,036        | 41.1         |
| N/A  | 1          | 0.3          | 405            | 0.6          | 124            | 0.1          | 76,753            | 0.2          |
| <b>Subtotal</b>  | <b>326</b> | <b>100.0</b> | <b>71,366</b>  | <b>100.0</b> | <b>140,153</b> | <b>100.0</b> | <b>50,773,622</b> | <b>100.0</b> |
| <b>2004 &amp; 2005</b>   | <b>576</b> | <b>100.0</b> | <b>129,120</b> | <b>100.0</b> | <b>276,909</b> | <b>100.0</b> | <b>95,420,937</b> | <b>100.0</b> |

\*Geography income level is based upon 2000 Census data on median family income figures for the MSA of the mortgaged property. Low-income is defined as <50% of the MSA median, moderate-income is 50% to <80%, middle-income is 80% to <120% and upper-income is at least 120%.

#### 1-4 Family HMDA-Reportable Loans

BPNA-NY has an excellent penetration of 1-4 family HMDA-reportable loans inside LMI census tracts.

In 2004, BPNA-NY extended 7.8% of its 1-4 family loans inside low-income census tracts. This was somewhat better than the market aggregate's ratio of 5.7%. In moderate-income areas, BPNA-NY achieved a penetration ratio of 29.8%; a rate that was well above the market aggregate's 22.1%.

In 2005, of its 1-4 family loans, BPNA-NY extended 13.6% inside low-income census tracts. This was substantially above the market aggregate's 6.4%. In moderate-income areas, BPNA-NY achieved a penetration ratio of 37.2%. The market aggregate, on the other hand, achieved a much lower penetration ratio of 23.7%.

Additionally, compared to the level of owner-occupied units within LMI census tracts, BPNA-NY's 1-4 family lending inside LMI census tracts was more than reasonable.

The following table illustrates the distribution of 1-4 family HMDA-reportable loans by geographic income level inside the assessment area during the evaluation period. For comparison, the level of owner-occupied housing units inside each census tract income category is provided:

| Distribution of 1-4 Family HMDA-Reportable Loans by Geography Income Level |                       |            |              |               |              |                |              |                   |              |
|--|-----------------------|------------|--------------|---------------|--------------|----------------|--------------|-------------------|--------------|
| Geography Income Level   | % of 1-4 Family Units | 2004       |              |               |              |                |              |                   |              |
|  |                       | BPNA-NY    |              |               |              | Aggregate      |              |                   |              |
|  |                       | #          | %            | (\$000)       | %            | #              | %            | (\$000)           | %            |
| Low  | 3.6                   | 16         | 7.8          | 1,465         | 4.1          | 7,565          | 5.7          | 1,903,932         | 4.9          |
| Moderate   | 18.7                  | 61         | 29.8         | 7,007         | 19.5         | 29,365         | 22.1         | 7,667,118         | 19.9         |
| Middle   | 36.2                  | 72         | 35.1         | 12,743        | 35.5         | 47,282         | 35.6         | 11,698,144        | 30.3         |
| Upper  | 41.5                  | 56         | 27.3         | 14,702        | 40.9         | 48,504         | 36.5         | 17,197,077        | 44.6         |
| NA   | 0                     | 0          | 0.0          | 0             | 0.0          | 249            | 0.2          | 122,949           | 0.3          |
| <b>Subtotal</b>  | <b>100.0</b>          | <b>205</b> | <b>100.0</b> | <b>35,917</b> | <b>100.0</b> | <b>132,965</b> | <b>100.0</b> | <b>38,589,220</b> | <b>100.0</b> |
| Geography Income Level   | % of 1-4 Family Units | 2005       |              |               |              |                |              |                   |              |
|  |                       | BPNA-NY    |              |               |              | Aggregate      |              |                   |              |
|  |                       | #          | %            | (\$000)       | %            | #              | %            | (\$000)           | %            |
| Low  | 3.6                   | 42         | 13.6         | 7,885         | 12.4         | 8,767          | 6.4          | 2,521,934         | 5.7          |
| Moderate   | 18.7                  | 115        | 37.2         | 19,787        | 31.2         | 32,382         | 23.7         | 9,492,433         | 21.4         |
| Middle   | 36.2                  | 105        | 34.0         | 24,268        | 38.3         | 50,354         | 36.9         | 13,887,962        | 31.3         |
| Upper  | 41.5                  | 46         | 14.9         | 11,074        | 17.5         | 45,017         | 32.9         | 18,427,854        | 41.5         |
| NA   | 0                     | 1          | 0.3          | 405           | 0.6          | 120            | 0.1          | 60,527            | 0.1          |
| <b>Subtotal</b>  | <b>100.0</b>          | <b>309</b> | <b>100.0</b> | <b>63,419</b> | <b>100.0</b> | <b>136,640</b> | <b>100.0</b> | <b>44,390,710</b> | <b>100.0</b> |
| <b>2004 &amp; 2005</b>   | <b>100.0</b>          | <b>514</b> | <b>100.0</b> | <b>99,336</b> | <b>100.0</b> | <b>269,605</b> | <b>100.0</b> | <b>82,979,930</b> | <b>100.0</b> |

### Multifamily HMDA-Reportable Loans

BPNA-NY has an adequate penetration of multifamily HMDA-reportable loans inside LMI census tracts.

In both 2004 and 2005, BPNA-NY's distribution of multifamily loans inside low-income areas was substantially below both the market aggregate's lending and percentage of multifamily housing units within these geographies.

Inside moderate-income areas, BPNA-NY's multifamily lending was above the market aggregate's performance in 2004, but trailed the aggregate by several percentage points in 2005. BPNA-NY's penetration of multifamily loans inside moderate-income areas was reasonable compared to the percentage of total multifamily housing units located inside these areas.

The following table illustrates the distribution of multifamily HMDA-reportable loans inside the assessment area during the evaluation period. For comparison, the level of multifamily housing units inside each census tract income category is included:

| Distribution of Multifamily HMDA-Reportable Loans by Geography Income Level |                        |           |              |               |              |              |              |                   |              |
|---|------------------------|-----------|--------------|---------------|--------------|--------------|--------------|-------------------|--------------|
| Geography Income Level  | % of Multifamily Units | 2004      |              |               |              |              |              |                   |              |
|   |                        | BPNA-NY   |              |               |              | Aggregate    |              |                   |              |
|   |                        | #         | %            | (\$000)       | %            | #            | %            | (\$000)           | %            |
| Low   | 20.3                   | 4         | 8.9          | 200           | 0.9          | 788          | 20.8         | 1,057,609         | 17.5         |
| Moderate  | 30.7                   | 20        | 44.4         | 9,729         | 44.6         | 1,475        | 38.9         | 1,693,576         | 28.0         |
| Middle  | 19.2                   | 14        | 31.1         | 9,340         | 42.8         | 635          | 16.8         | 1,171,230         | 19.3         |
| Upper   | 29.8                   | 7         | 15.6         | 2,568         | 11.7         | 890          | 23.5         | 2,128,260         | 35.1         |
| NA  | 0.0                    | 0         | 0.0          | 0             | 0.0          | 3            | 0.1          | 7,420             | 0.1          |
| <b>Subtotal</b>   | <b>100.0</b>           | <b>45</b> | <b>100.0</b> | <b>21,837</b> | <b>100.0</b> | <b>3,791</b> | <b>100.0</b> | <b>6,058,095</b>  | <b>100.0</b> |
| Geography Income Level  | % of Multifamily Units | 2005      |              |               |              |              |              |                   |              |
|   |                        | BPNA-NY   |              |               |              | Aggregate    |              |                   |              |
|   |                        | #         | %            | (\$000)       | %            | #            | %            | (\$000)           | %            |
| Low   | 20.3                   | 1         | 5.9          | 300           | 3.8          | 725          | 20.6         | 963,219           | 15.1         |
| Moderate  | 30.7                   | 5         | 29.4         | 2,450         | 30.8         | 1,429        | 40.7         | 2,052,395         | 32.2         |
| Middle  | 19.2                   | 8         | 47.1         | 2,482         | 31.2         | 572          | 16.3         | 871,890           | 13.7         |
| Upper   | 29.8                   | 3         | 17.6         | 2,715         | 34.2         | 783          | 22.3         | 2,479,182         | 38.8         |
| NA  | 0.0                    | 0         | 0.0          | 0             | 0.0          | 4            | 0.1          | 16,226            | 0.3          |
| <b>Subtotal</b>   | <b>100.0</b>           | <b>17</b> | <b>100.0</b> | <b>7,947</b>  | <b>100.0</b> | <b>3,513</b> | <b>100.0</b> | <b>6,382,912</b>  | <b>100.0</b> |
| <b>2004 &amp; 2005</b>  | <b>100.0</b>           | <b>62</b> | <b>100.0</b> | <b>29,784</b> | <b>100.0</b> | <b>7,304</b> | <b>100.0</b> | <b>12,441,007</b> | <b>100.0</b> |

### Small Business Loans

The distribution of BPNA-NY's small business loans reflects excellent penetration inside LMI census tracts.

In 2004, BPNA-NY extended 12.2% of its small business loans inside low-income census tracts. For the market aggregate, the low-income area penetration ratio was 6.9%. In moderate-income areas, BPNA-NY achieved a penetration ratio of 41.0%. This level of moderate-income lending was substantially above the market aggregate's 19.7%.

In 2005, BPNA-NY's 17.1% ratio of lending in low-income areas remained above the market aggregate's 6.8%. In moderate-income areas, BPNA-NY achieved a penetration ratio of 31.8%, which was well above the market aggregate's 20.9%.

Furthermore, BPNA-NY's strong penetration of small business loans inside LMI areas was highlighted by the fact that in both 2004 and 2005, the proportion of small business loans it extended in these communities was well above the level of businesses located in those areas.

The following table illustrates the geographic distribution of small business loans inside the assessment area during the evaluation period. For comparison, the level of businesses located in each census tract income level is included:

| Distribution of Small Business Loans by Geography Income Level* |                    |              |              |                |              |                |              |                   |              |
|---|--------------------|--------------|--------------|----------------|--------------|----------------|--------------|-------------------|--------------|
| Geography<br>Income<br>Level                                    | % of<br>Businesses | 2004         |              |                |              |                |              |                   |              |
|   |                    | BPNA-NY      |              |                |              | Aggregate      |              |                   |              |
|   |                    | #            | %            | (\$000)        | %            | #              | %            | (\$000)           | %            |
| Low   | 8.5                | 96           | 12.2         | 9,486          | 6.0          | 12,308         | 6.9          | 377,372           | 6.5          |
| Moderate  | 21.1               | 322          | 41.0         | 80,044         | 50.4         | 34,990         | 19.7         | 1,041,917         | 18.0         |
| Middle  | 22.1               | 223          | 28.4         | 43,380         | 27.3         | 42,199         | 23.8         | 1,187,702         | 20.5         |
| Upper   | 46.7               | 140          | 17.8         | 25,076         | 15.8         | 85,797         | 48.3         | 3,064,315         | 52.8         |
| N/A   | 1.6                | 5            | 0.6          | 600            | 0.5          | 2,227          | 1.3          | 132,679           | 2.2          |
| <b>Subtotal</b>   | <b>100.0</b>       | <b>786</b>   | <b>100.0</b> | <b>158,676</b> | <b>100.0</b> | <b>177,521</b> | <b>100.0</b> | <b>5,803,985</b>  | <b>100.0</b> |
| Geography<br>Income<br>Level                                    | % of<br>Businesses | 2005         |              |                |              |                |              |                   |              |
|   |                    | BPNA-NY      |              |                |              | Aggregate      |              |                   |              |
|   |                    | #            | %            | (\$000)        | %            | #              | %            | (\$000)           | %            |
| Low   | 8.7                | 97           | 17.1         | 7,552          | 8.9          | 11,547         | 6.8          | 367,979           | 6.4          |
| Moderate  | 21.4               | 180          | 31.8         | 13,037         | 15.3         | 35,267         | 20.9         | 1,017,999         | 17.6         |
| Middle  | 22.4               | 165          | 29.2         | 42,345         | 49.8         | 42,253         | 25.1         | 1,306,298         | 22.6         |
| Upper   | 46.2               | 116          | 20.5         | 20,507         | 24.1         | 77,838         | 46.2         | 2,965,129         | 51.3         |
| N/A   | 1.3                | 8            | 1.4          | 1,570          | 1.9          | 1,714          | 1.0          | 121,801           | 2.1          |
| <b>Subtotal</b>   | <b>100.0</b>       | <b>566</b>   | <b>100.0</b> | <b>85,011</b>  | <b>100.0</b> | <b>168,619</b> | <b>100.0</b> | <b>5,779,206</b>  | <b>100.0</b> |
| <b>2004 &amp; 2005</b>  | <b>100.0</b>       | <b>1,352</b> | <b>100.0</b> | <b>243,687</b> | <b>100.0</b> | <b>346,140</b> | <b>100.0</b> | <b>11,583,191</b> | <b>100.0</b> |

\*Geography income level is based upon 2000 Census data on median family income figure for the MSA where the business is located. Low-income is defined as <50% of the MSA median, moderate-income is 50% to <80%, middle-income is 80% to <120% and upper-income is at least 120%.

### Lending in LMI Census Tracts (by County)

#### HMDA-Reportable Loans

In general, BPNA-NY achieved a greater penetration of HMDA-reportable loans inside LMI census tracts in each county of the assessment area than did the aggregate.

The following table shows the LMI-area penetration ratios of HMDA-reportable loans in each of the counties comprising the assessment area, based on the number of loans originated.

| LMI-Geography Penetration Ratios of HMDA-Reportable Loans (by County)* |            |             |            |             |             |             |            |             |
|--|------------|-------------|------------|-------------|-------------|-------------|------------|-------------|
| County   | 2004       |             |            |             | 2005        |             |            |             |
|  | BPNA-NY    |             | Aggregate  |             | BPNA-NY     |             | Aggregate  |             |
|  | Low        | Moderate    | Low        | Moderate    | Low         | Moderate    | Low        | Moderate    |
|  | %          | %           | %          | %           | %           | %           | %          | %           |
| Bronx  | 17.5       | 36.8        | 17.3       | 28.9        | 33.3        | 34.7        | 17.6       | 29.2        |
| Kings  | 9.9        | 39.4        | 10.3       | 37.6        | 13.1        | 41.4        | 11.7       | 38.9        |
| New York   | 8.6        | 8.6         | 4.2        | 8.4         | 20.8        | 37.5        | 4.9        | 9.9         |
| Queens   | 0.0        | 34.1        | 0.7        | 16.2        | 0.8         | 34.6        | 0.8        | 17.3        |
| <b>Assessment Area</b>   | <b>8.0</b> | <b>32.4</b> | <b>6.1</b> | <b>22.6</b> | <b>13.2</b> | <b>36.8</b> | <b>6.8</b> | <b>24.1</b> |

\* None of the 16 census tracts in the part of Westchester County included in the assessment area are LMI.

## Small Business Loans

BPNA-NY's penetration rate of small business loans originated in LMI areas was generally higher than the aggregate's rate in each of the counties in the assessment area.

The following table shows the LMI-area penetration ratios of small business loans in each of the counties comprising the assessment area. The information is based on number of loans originated.

| LMI-Geography Penetration Ratios of Small Business Loans (by County)* |             |             |            |             |             |             |            |             |
|---|-------------|-------------|------------|-------------|-------------|-------------|------------|-------------|
| County  | 2004        |             |            |             | 2005        |             |            |             |
|   | BPNA-NY     |             | Aggregate  |             | BPNA-NY     |             | Aggregate  |             |
|   | Low         | Moderate    | Low        | Moderate    | Low         | Moderate    | Low        | Moderate    |
|   | %           | %           | %          | %           | %           | %           | %          | %           |
| Bronx   | 52.1        | 28.8        | 31.2       | 29.2        | 54.1        | 21.6        | 30.0       | 29.7        |
| Kings   | 9.7         | 42.2        | 10.9       | 39.0        | 13.1        | 40.4        | 10.7       | 39.4        |
| New York  | 11.2        | 50.3        | 4.3        | 6.4         | 19.9        | 29.1        | 4.6        | 6.9         |
| Queens  | 1.1         | 29.8        | 1.1        | 24.5        | 0.7         | 28.6        | 1.0        | 25.2        |
| <b>Assessment Area</b>  | <b>12.2</b> | <b>41.0</b> | <b>6.9</b> | <b>19.7</b> | <b>17.1</b> | <b>31.8</b> | <b>6.8</b> | <b>20.9</b> |

\* None of the 16 census tracts in the part of Westchester County included in the assessment area are LMI.

## **Borrower Characteristics:**<sup>3</sup> "High Satisfactory"

The distribution of BPNA-NY's loans reflects excellent penetration among customers of different income levels, and good penetration among businesses of different sizes.

During the evaluation period, BPNA-NY originated 21.8% of its 1-4 family HMDA-reportable loans to LMI borrowers. This ratio was substantially above the market aggregate's 7.5%. Similarly, during the same period, BPNA-NY extended 60.9% of its small business loans to small businesses, which is defined as businesses with gross annual revenues of \$1 million or less. This was well above the market aggregate's 44.5%.

### 1-4 Family HMDA-Reportable Loans

The distribution of 1-4 family loans reflects excellent penetration among LMI borrowers.

In 2004, of its 1-4 family loans, BPNA-NY extended 8.8% among low- and 13.7% among moderate-income borrowers. In contrast, the market aggregate extended 1.4% among low- and 7.2% among moderate-income borrowers.

In 2005, BPNA-NY's penetration rate of extending 1-4 family loans to low-income borrowers was 5.2% and to moderate-income borrowers was 16.2%. The market aggregate's LMI-borrower penetration rate was much lower, at 0.9% among low- and 5.5% among

<sup>3</sup> For further details regarding borrower characteristics refer to Section 5. For HMDA-reportable loans, refer to Exhibits 5-5 and 5-6. For small business loans, refer to exhibits 5-7 and 5-8.

moderate-income borrowers.

Further analysis showed that although approximately 20% of the households in the assessment area were living below the poverty level, BPNA-NY's origination of 1-4 family mortgages among low-income borrowers was reasonable. BPNA-NY's lending among moderate-income borrowers also was reasonable considering that 16.9% of the families in the assessment area were moderate-income.

The following table depicts the distribution of 1-4 family HMDA-reportable loans by borrower income level. For comparison, family income levels are included:

| Distribution of 1-4 Family HMDA-Reportable Loans by Borrower Income Level* |               |            |              |                |              |            |              |                |              |
|--|---------------|------------|--------------|----------------|--------------|------------|--------------|----------------|--------------|
| Borrower Income Level  | % of Families | 2004       |              |                |              | 2005       |              |                |              |
|  |               | BPNA-NY    |              | Aggregate      |              | BPNA-NY    |              | Aggregate      |              |
|  |               | #          | %            | #              | %            | #          | %            | #              | %            |
| Low  | 31.6          | 18         | 8.8          | 1,845          | 1.4          | 16         | 5.2          | 1,197          | 0.9          |
| Moderate   | 16.9          | 28         | 13.7         | 9,586          | 7.2          | 50         | 16.2         | 7,578          | 5.5          |
| Middle   | 17.0          | 42         | 20.5         | 26,567         | 20.0         | 63         | 20.4         | 20,898         | 15.3         |
| Upper  | 34.5          | 106        | 51.7         | 84,899         | 63.9         | 143        | 46.3         | 98,288         | 71.9         |
| NA   | 0.0           | 11         | 5.3          | 10,068         | 7.5          | 37         | 12.0         | 8,679          | 6.4          |
| <b>Total</b>   | <b>100.0</b>  | <b>205</b> | <b>100.0</b> | <b>132,965</b> | <b>100.0</b> | <b>309</b> | <b>100.0</b> | <b>136,640</b> | <b>100.0</b> |

\*Borrower income level is based upon the Department of Housing and Urban Development's annual estimate of median family income figures for the MSA of the mortgaged property. Low-income is defined as <50% of the MSA median, moderate-income is 50% to <80%, middle-income is 80% to <120% and upper-income is at least 120%.

### Small Business Loans

The distribution of small business loans reflects good penetration among small businesses.

In 2004, 62.1% of BPNA-NY's small business loans were extended to small businesses. This rate of lending significantly outperformed the market aggregate's 39.3% although it was slightly below the 63.1% of businesses in the assessment area that were classified as small businesses.

In 2005, BPNA-NY continued to reasonably meet the credit needs of small businesses within the assessment area. BPNA-NY extended 59.2% of its small business loans to small businesses compared to 50% by the market aggregate. Of the total businesses in the assessment area, 62.5% were classified as small.

The following table shows the borrower characteristics of BPNA-NY's small business lending inside the assessment area during the evaluation period:

| Distribution of Small Business Loans by Business Revenue Size |            |              |                |              |           |            |              |               |              |           |
|---|------------|--------------|----------------|--------------|-----------|------------|--------------|---------------|--------------|-----------|
| Gross Annual Revenues \$(000)                                 | 2004       |              |                |              |           | 2005       |              |               |              |           |
|   | BPNA-NY    |              |                |              | Aggregate | BPNA-NY    |              |               |              | Aggregate |
|   | #          | %            | \$(000)        | %            | % of #    | #          | %            | \$(000)       | %            | % of #    |
| <=\$1,000   | 488        | 62.1         | 131,243        | 82.7         | 39.3      | 335        | 59.2         | 49,331        | 58.0         | 50.0      |
| >\$1,000  | 103        | 13.1         | 25,560         | 16.1         |           | 205        | 36.2         | 33,999        | 40.0         |           |
| Unknown   | 195        | 24.8         | 1,873          | 1.2          |           | 26         | 4.6          | 1,681         | 2.0          |           |
| <b>Total</b>  | <b>786</b> | <b>100.0</b> | <b>158,676</b> | <b>100.0</b> |           | <b>566</b> | <b>100.0</b> | <b>85,011</b> | <b>100.0</b> |           |

*Lending Among LMI Borrowers and Small Businesses (by County)*

1-4 Family HMDA-Reportable Loans

The proportion of 1-4 family loans that BPNA-NY extended among LMI borrowers in each county of the assessment area generally exceeded the market aggregate's performance.

The following table shows the distribution of 1-4 family loans among LMI borrowers in each county of the assessment area:

| LMI-Borrower Penetration Ratios of 1-4 Family HMDA-Reportable Loans (by County)* |            |             |            |            |            |             |            |            |  |
|--|------------|-------------|------------|------------|------------|-------------|------------|------------|--|
| County   | 2004       |             |            |            | 2005       |             |            |            |  |
|  | BPNA-NY    |             | Aggregate  |            | BPNA-NY    |             | Aggregate  |            |  |
|  | Low        | Moderate    | Low        | Moderate   | Low        | Moderate    | Low        | Moderate   |  |
|  | % of Total | % of Total  | % of Total | % of Total | % of Total | % of Total  | % of Total | % of Total |  |
| Bronx  | 16.0       | 18.0        | 2.1        | 9.8        | 8.8        | 25.0        | 1.4        | 8.3        |  |
| Kings  | 12.5       | 8.3         | 1.7        | 7.6        | 4.4        | 19.8        | 1.0        | 5.6        |  |
| New York   | 0.0        | 0.0         | 0.3        | 2.4        | 21.7       | 13.0        | 0.3        | 1.8        |  |
| Queens   | 5.3        | 18.7        | 1.4        | 8.3        | 0.8        | 9.5         | 0.9        | 6.1        |  |
| Westchester  | 0.0        | 50.0        | 0.8        | 5.4        | 0.0        | 0.0         | 0.7        | 3.8        |  |
| <b>Total</b>   | <b>8.8</b> | <b>13.7</b> | <b>1.4</b> | <b>7.2</b> | <b>5.2</b> | <b>16.2</b> | <b>0.9</b> | <b>5.6</b> |  |

\* The 50% ratio shown for Westchester County in 2004 represents one of only two loans.

Small Business Loans

BPNA-NY had a good penetration of small business loans among small businesses throughout the assessment area.

The following table illustrates the distribution of small business loans among small businesses in each county comprising the assessment area:

| Distribution of Small Business Loans Among Small Businesses (by County)* |             |             |             |             |
|--|-------------|-------------|-------------|-------------|
| County   | 2004        |             | 2005        |             |
|  | BPNA-NY     | Aggregate   | BPNA-NY     | Aggregate   |
|  | % of Total  | % of Total  | % of Total  | % of Total  |
| Bronx  | 63.0        | 39.5        | 56.8        | 51.1        |
| Kings  | 52.3        | 39.3        | 46.0        | 52.1        |
| New York   | 66.0        | 39.6        | 62.3        | 49.1        |
| Queens   | 69.1        | 38.5        | 77.1        | 49.2        |
| Westchester  | 25.0        | 40.4        | 0.0         | 50.1        |
| <b>Total</b>   | <b>62.1</b> | <b>39.3</b> | <b>59.2</b> | <b>50.0</b> |

\* The 25% ratio shown for Westchester County in 2004 represents one of only four loans.

### **Innovative and Flexible Lending Practices: “Low Satisfactory”**

BPNA-NY’s lending activities include a variety of flexible products such as loans guaranteed by the U.S. Small Business Administration (“SBA”). However, use of these products within the assessment area is limited. During the evaluation period, BPNA-NY extended 94 SBA loans aggregating \$9.7 million. This is less than 10% of the total SBA loan volume for BPNA as a whole. Since BPNA-NY provides approximately one-third of BPNA’s deposits, the level of BPNA-NY’s SBA loan originations is disproportionately low.

### **Community Development Lending: “Outstanding”**

BPNA-NY had \$127.4 million in qualified community development loans during the current evaluation period. This represents an increase of approximately 98% over the previous evaluation’s total. Approximately \$94 million of the current evaluation’s activity comprises new money.

The following are examples of qualified community development loans BPNA-NY extended during the evaluation period:

- BPNA-NY extended a loan for \$2.4 million to a private developer to refinance an existing first mortgage and provide funds for upgrading the property, which is a temporary family transitional shelter. The property is rented to Aguila, Inc., a not-for-profit that provides housing, social service programs, maintenance, housekeeping and security at the building, which has 55 rooms. Participants are referred to the not-for-profit by the New York City Department of Homeless Services (“DHS”). DHS pays for the services provided to residents.
- BPNA-NY extended a loan for \$8 million to Thirdview, a not-for-profit that owns and operates a transitional shelter for homeless women. The shelter is operated by St. Christopher Otilie, a nonprofit organization that is funded by the DHS.
- BPNA-NY extended a \$1.3 million loan to La Peninsula Community Organization, Inc., a not-for-profit organization, to assist in funding the construction of a two-story building.

The property will house the organization's eighth Head Start day care facility. The organization receives funding from both the City of New York and the federal government.

- BPNA-NY extended a \$1.2 million loan to Institute Home Care Services, Inc., a not-for-profit community services organization, to support the institution's working capital needs. The organization provides attendant services to 800 patients/cases annually under contract with the City of New York Human Resources Administration ("HRA").
- BPNA-NY renewed a \$1 million line of credit extended to Christian Community In Action, a not-for-profit community services organization. The organization employs more than 1,300 home health care workers, handling cases under contract with the HRA.
- BPNA-NY extended \$3.8 million to a private developer for the creation of new commercial/retail space. The project is being developed under the New York City Department of Housing Preservation and Development's ("HPD") ANCHOR Program. The ANCHOR Program is a neighborhood revitalization initiative to create over 300,000 square feet of commercial/retail space and over 1,000 units of low to middle-income housing on vacant city-owned land.

Please refer to the following table for a summary of BPNA-NY's qualified community development loans:

| <b>BPNA-NY's Qualified Community Development Loans</b> |                          |                |              |                        |                |  |                |
|--|--------------------------|----------------|--------------|------------------------|----------------|--|----------------|
| <b>Category</b>  | <b>Total Commitments</b> |                |              | <b>New Commitments</b> |                | <b>Prior Period Outstanding Balances</b> |                |
|  | <b>#</b>                 | <b>(\$000)</b> | <b>%</b>     | <b>#</b>               | <b>(\$000)</b> | <b>#</b>                                 | <b>(\$000)</b> |
| Affordable Housing                                     | 39                       | 41,959         | 32.9         | 26                     | 26,302         | 13                                       | 15,657         |
| Community Service                                      | 59                       | 71,714         | 56.3         | 46                     | 55,457         | 13                                       | 16,257         |
| Economic Development                                   | 7                        | 5,723          | 4.5          | 5                      | 4,460          | 2  | 1,263          |
| Revitalization/Stabilization                           | 8                        | 8,033          | 6.3          | 8                      | 8,033          | 0  | 0              |
| <b>Total</b>   | <b>113</b>               | <b>127,429</b> | <b>100.0</b> | <b>85</b>              | <b>94,252</b>  | <b>28</b>                                | <b>33,177</b>  |

**II. Investment Test: “High Satisfactory”**

*BPNA-NY’s investment performance is evaluated pursuant to the following criteria: 1) the dollar amount of qualified investments; 2) the innovativeness or complexity of qualified investments; 3) the responsiveness of qualified investments to credit and community development needs; 4) the degree to which the qualified investments are not routinely provided by private investors.*

BPNA-NY’s level of qualified community development investments reflects good responsiveness to credit and economic development needs.

During the evaluation period, BPNA-NY’s qualified community development investments totaled \$7.5 million. This includes \$4.3 million in new commitments. The new investments include the purchase of three qualified mortgage-backed securities aggregating approximately \$3.2 million. These investments support affordable housing in the assessment area. Two are collateralized by loans to LMI borrowers. The third is secured by a multifamily property containing almost 250 units available for rental under HUD’s Section 8 rental assistance program.

The following table summarizes BPNA-NY’s qualified community development investments:

| <b>BPNA-NY’s Qualified Community Development Investments</b> |                          |                |              |                        |                |  |                |
|--|--------------------------|----------------|--------------|------------------------|----------------|--|----------------|
| <b>Category</b>  | <b>Total Commitments</b> |                |              | <b>New Commitments</b> |                | <b>Prior Evaluation Outstanding Balances</b> |                |
|  | <b>#</b>                 | <b>(\$000)</b> | <b>%</b>     | <b>#</b>               | <b>(\$000)</b> | <b>#</b>                                     | <b>(\$000)</b> |
| Affordable Housing   | 13                       | 6,392          | 85.6         | 9                      | 3,173          | 4  | 3,219          |
| Community Service  | 61                       | 374            | 5.0          | 61                     | 374            | 0  | 0              |
| Economic Development   | 3                        | 503            | 6.7          | 3                      | 503            | 0  | 0              |
| Revitalization/Stabilization                                 | 2                        | 200            | 2.7          | 2                      | 200            | 0  | 0              |
| <b>Total</b>   | <b>79</b>                | <b>7,469</b>   | <b>100.0</b> | <b>75</b>              | <b>4,250</b>   | <b>4</b>                                     | <b>3,219</b>   |

### III. Service Test: “Outstanding”

The service test evaluates a banking institution's record of helping to meet the credit needs of its assessment area by analyzing both the availability and effectiveness of a banking institution's systems for delivering retail banking services and the extent and innovativeness of its community development services.

#### **Retail Banking Services:** “Outstanding”

##### Accessibility of Delivery Systems

BPNA-NY’s delivery systems are readily accessible to all portions of the assessment area.

BPNA operates 32 full-service branch offices within New York State. Of these branches, approximately 66% were located in an LMI census tract and about 16.0% were located in either middle- or upper-income tracts that were adjacent to LMI geographies. BPNA also maintained mortgage centers at two of its branches located in moderate-income areas.

The following table illustrates the distribution of BPNA-NY’s branch offices by county and census tract income levels:

| Geographic Distribution of BPNA-NY Offices (by County) |           |           |          |          |           |                            |                       |             |  |             |
|--|-----------|-----------|----------|----------|-----------|----------------------------|-----------------------|-------------|--|-------------|
| County   | Low       | Moderate  | Middle   | Upper    | Total     | County % of Total Branches | Branches in LMI Areas |             | Branches in Tracts Adjacent to LMI Areas |             |
|  |           |           |          |          |           |                            | #                     | %           | #  | %           |
| Bronx  | 4         | 0         | 1        | 0        | 5         | 15.6                       | 4                     | 80.0        | 1  | 20.0        |
| Kings  | 1         | 5         | 3        | 1        | 10        | 31.3                       | 6                     | 60.0        | 2  | 20.0        |
| Queens   | 0         | 4         | 1        | 0        | 5         | 15.6                       | 4                     | 80.0        | 1  | 20.0        |
| New York   | 5         | 2         | 1        | 3        | 11        | 34.4                       | 7                     | 63.6        | 1  | 9.1         |
| Westchester*   | 0         | 0         | 1        | 0        | 1         | 3.1                        | 0                     | 0.0         | 0  | 0.0         |
| <b>Assessment Area</b>                                 | <b>10</b> | <b>11</b> | <b>7</b> | <b>4</b> | <b>32</b> | <b>100.0</b>               | <b>21</b>             | <b>65.6</b> | <b>5</b>                                 | <b>15.6</b> |
| % by Category  | 31.3      | 34.4      | 21.8     | 12.5     | 100.0     | 100.0                      |                       |             |  |             |

\*Partial County

##### *Alternative Delivery Systems*

In addition to regular teller service, BPNA-NY operates a network of 59 automated teller machines (“ATMS”) in its branches, and seven ATMs that are remotely located. BPNA-NY’s delivery systems also include “Popular Net Banking.” Popular Net Banking is an online banking service that allows customers to access their accounts to review transaction history, perform balance transfers, pay bills online and view images of paid checks.

### Changes in Branch Locations

BPNA-NY's record of opening and closing branches has not adversely affected the accessibility of its delivery systems particularly in LMI geographies or to LMI individuals.

During 2004 and 2005, BPNA-NY relocated two branches from moderate-income census tracts to other moderate-income census tracts. These relocations did not affect access to BPNA-NY's delivery systems.

### Reasonableness of Business Hours and Services

BPNA-NY's business hours and services are tailored to the convenience and needs of its assessment area, particularly LMI geographies and/or LMI individuals.

Of BPNA-NY's 32 branch offices, 22 are open during extended hours on weekdays, 16 are open on Saturdays and two are open on Sundays. Only three branches offer neither extended hours on weekdays nor weekend hours. These branches are located in middle or upper-income areas. In addition to convenient business hours, BPNA-NY offers various consumer and business products that are reasonable and targeted to meet the specific needs of the communities served by BPNA-NY.

An example of the types of service products BPNA-NY provides to meet community needs is "Totally Free Checking." This type of account includes features such as no minimum balance requirement, no monthly fee, unlimited check writing, free BPNA ATM access and image statements at no charge.

BPNA-NY also offers "Totally Free Business Checking," designed for small businesses. This account includes features such as no minimum balance requirement, no monthly fee, free BPNA ATM access and free image statements.

### **Community Development Services: "Outstanding"**

BPNA-NY is a leader in providing qualified community development services. The type of qualified community development services BPNA-NY generally provides includes programs to promote financial literacy and educate businesses and consumers about special products and services available to them. BPNA-NY also joins with community-based entities promoting affordable housing and economic development activities within the assessment area.

The following are examples of organizations that BPNA-NY collaborated with in providing qualified community development services:

- New York State Department of Labor
- New York City Workforce1 Career Centers
- Accion New York
- Bronx Initiative Corporation
- East Harlem Chamber of Commerce

The following are examples of community development services provided by BPNA-NY in the assessment area during the evaluation period:

- During 2004, BPNA-NY conducted a financial literacy seminar with 63 children in attendance. The purpose of this presentation was to acquaint participants with financial services. At this event, 57 “Populoso” accounts were opened with checks originating from City of New York after-school program activities. The Populoso Savings Club is a special statement savings account for children 17 or younger. Only \$10 is needed to open an account and there is no minimum balance requirement.
- During 2005, BPNA-NY, in conjunction with the U.S. Small Business Administration (“SBA”) conducted an SBA seminar in Brooklyn. The seminar’s purpose was to create awareness of the different small business programs for new, start-up or expanding small businesses. There were 100 attendees at this seminar.
- During 2005, BPNA-NY co-sponsored a financial literacy seminar. The seminar introduced money management skills to women receiving public assistance.

Many of BPNA-NY’s officers and managers provide community development services through volunteer activities within the community. The following are examples of these qualified community development services:

- An officer of BPNA-NY, a business-banking specialist, is a member of a community development organization’s loan committee. The organization operates a loan fund that makes loans to small businesses that do not qualify for conventional lending. It also conducts educational sessions for new and existing business owners.
- BPNA-NY’s CRA officer is a board member of a community development organization that has adapted a leadership position in promoting community development initiatives in LMI neighborhoods. The ways through which the organization seeks to accomplish its mission include working with the underserved in education, employment and housing.

#### **IV. Discrimination or Other Illegal Practices**

##### **Any practices intended to discourage applications for types of credit set forth in the banking institution's CRA Public File.**

There were no practices noted that were intended to discourage applications for the type of credit offered by the institution.

##### **Evidence of prohibited discriminatory or other illegal credit practices**

The most recent regulatory compliance report indicates a satisfactory performance in terms of adherence to antidiscrimination or other applicable laws and regulations. No evidence of prohibited discrimination or other illegal credit practices was noted.

#### **V. Process Factors**

##### **Activities conducted by the banking institution to ascertain the credit needs of its community, including the extent of the banking institution's efforts to communicate with members of its community regarding the credit services being provided by the banking institution.**

Through its CRA outreach program, BPNA-NY maintains ongoing communication with community development groups, local building and civic associations, housing rehabilitation groups, local officials and clergy or any other community-based organizations that can speak for the need of the community. Under BPNA-NY's CRA outreach program, 308 CRA telephone calls were made during the evaluation period.

##### **The extent of the banking institution's marketing and special credit-related programs to make members of the community aware of the credit services offered by the banking institution**

BPNA-NY's marketing efforts include seminars and presentations that give members of the community an awareness of the credit services offered by the institution.

##### **The extent of participation by the banking institution's board of directors/trustees in formulating the banking institution's policies and reviewing its performance with respect to the purposes of the Community Reinvestment Act**

The board of directors plays an active role in formulating BPNA-NY's CRA policies. The Corporate Compliance Committee is responsible for making presentations to the board regarding CRA. The board also reviews and approves the CRA statement annually to effect changes as deemed necessary. A CRA officer has been appointed by the board to oversee BPNA-NY's compliance with the CRA. This officer reports to management and the board on a quarterly basis.

**VI. Other Factors**

**Other factors that in the judgment of the Superintendent and Banking Board bear upon the extent to which a banking institution is helping to meet the credit needs of its entire community**

None noted.

| HMDA LOAN ORIGINATIONS <sup>1</sup>                    |                           |               |               |               |               |             |               |               |               |                  |               |              |               |             |               |              |               |            |               |                |               |      |
|--|---------------------------|---------------|---------------|---------------|---------------|-------------|---------------|---------------|---------------|------------------|---------------|--------------|---------------|-------------|---------------|--------------|---------------|------------|---------------|----------------|---------------|------|
| YEAR 2004  |                           |               |               |               |               |             |               |               |               |                  |               |              |               |             |               |              |               |            |               |                |               |      |
| GEOGRAPHY INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS |                           |               |               |               |               |             |               |               |               |                  |               |              |               |             |               |              |               |            |               |                |               |      |
| County/Area  | Geography<br>Income Level | Home Purchase |               |               |               | Refinancing |               |               |               | Home Improvement |               |              |               | Multifamily |               |              |               | Total      |               |                |               |      |
|  |                           | Bank #        | Bank %        | Agg. #        | Agg. %        | Bank #      | Bank %        | Agg. #        | Agg. %        | Bank #           | Bank %        | Agg. #       | Agg. %        | Bank #      | Bank %        | Agg. #       | Agg. %        | Bank #     | Bank %        | Agg. #         | Agg. %        |      |
| Bronx  | low                       | -             | -             | 1,015         | 15.69         | 4           | 18.18         | 1,132         | 15.33         | 5                | 45.45         | 194          | 19.78         | 1           | 14.29         | 339          | 52.97         | 10         | 17.54         | 2,680          | 17.32         |      |
|  | moderate                  | 7             | 41.18         | 1,871         | 28.93         | 9           | 40.91         | 2,122         | 28.73         | 2                | 18.18         | 253          | 25.79         | 3           | 42.86         | 220          | 34.38         | 21         | 36.84         | 4,466          | 28.86         |      |
|  | middle                    | 6             | 35.29         | 1,933         | 29.89         | 4           | 18.18         | 2,481         | 33.60         | 3                | 27.27         | 349          | 35.58         | 3           | 42.86         | 51           | 7.97          | 16         | 28.07         | 4,814          | 31.11         |      |
|  | upper                     | 4             | 23.53         | 1,632         | 25.23         | 5           | 22.73         | 1,646         | 22.29         | 1                | 9.09          | 184          | 18.76         | -           | -             | 30           | 4.69          | 10         | 17.54         | 3,492          | 22.57         |      |
|  | zero & NAs                | -             | -             | 17            | 0.26          | -           | -             | 4             | 0.05          | -                | -             | 1            | 0.10          | -           | -             | -            | -             | -          | -             | -              | 22            | 0.14 |
| <b>22.8</b>  | <b>total</b>              | <b>17</b>     | <b>100.00</b> | <b>6,468</b>  | <b>100.00</b> | <b>22</b>   | <b>100.00</b> | <b>7,385</b>  | <b>100.00</b> | <b>11</b>        | <b>100.00</b> | <b>981</b>   | <b>100.00</b> | <b>7</b>    | <b>100.00</b> | <b>640</b>   | <b>100.00</b> | <b>57</b>  | <b>100.00</b> | <b>15,474</b>  | <b>100.00</b> |      |
| Kings  | low                       | -             | -             | 1,935         | 10.83         | 3           | 13.64         | 1,890         | 9.35          | 1                | 5.56          | 187          | 8.65          | 3           | 13.04         | 299          | 20.95         | 7          | 9.86          | 4,311          | 10.34         |      |
|  | moderate                  | 3             | 37.50         | 6,367         | 35.62         | 8           | 36.36         | 7,706         | 38.12         | 4                | 22.22         | 852          | 39.43         | 13          | 56.52         | 745          | 52.21         | 28         | 39.44         | 15,670         | 37.60         |      |
|  | middle                    | 3             | 37.50         | 5,840         | 32.67         | 6           | 27.27         | 6,827         | 33.77         | 11               | 61.11         | 731          | 33.83         | 4           | 17.39         | 233          | 16.33         | 24         | 33.80         | 13,631         | 32.70         |      |
|  | upper                     | 2             | 25.00         | 3,693         | 20.66         | 5           | 22.73         | 3,774         | 18.67         | 2                | 11.11         | 387          | 17.91         | 3           | 13.04         | 148          | 10.37         | 12         | 16.90         | 8,002          | 19.20         |      |
|  | zero & NAs                | -             | -             | 40            | 0.22          | -           | -             | 20            | 0.10          | -                | -             | 4            | 0.19          | -           | -             | 2            | 0.14          | -          | -             | -              | 66            | 0.16 |
| <b>28.4</b>  | <b>total</b>              | <b>8</b>      | <b>100.00</b> | <b>17,875</b> | <b>100.00</b> | <b>22</b>   | <b>100.00</b> | <b>20,217</b> | <b>100.00</b> | <b>18</b>        | <b>100.00</b> | <b>2,161</b> | <b>100.00</b> | <b>23</b>   | <b>100.00</b> | <b>1,427</b> | <b>100.00</b> | <b>71</b>  | <b>100.00</b> | <b>41,680</b>  | <b>100.00</b> |      |
| New York   | low                       | 1             | 12.50         | 587           | 4.05          | 1           | 5.26          | 227           | 2.91          | 1                | 33.33         | 34           | 6.49          | -           | -             | 150          | 13.23         | 3          | 8.57          | 998            | 4.17          |      |
|  | moderate                  | -             | -             | 999           | 6.90          | 2           | 10.53         | 666           | 8.54          | 1                | 33.33         | 89           | 16.98         | -           | -             | 248          | 21.87         | 3          | 8.57          | 2,002          | 8.36          |      |
|  | middle                    | -             | -             | 645           | 4.46          | -           | -             | 329           | 4.22          | -                | -             | 28           | 5.34          | 4           | 80.00         | 95           | 8.38          | 4          | 11.43         | 1,097          | 4.58          |      |
|  | upper                     | 7             | 87.50         | 12,192        | 84.22         | 16          | 84.21         | 6,547         | 83.94         | 1                | 33.33         | 370          | 70.61         | 1           | 20.00         | 640          | 56.44         | 25         | 71.43         | 19,749         | 82.51         |      |
|  | zero & NAs                | -             | -             | 54            | 0.37          | -           | -             | 31            | 0.40          | -                | -             | 3            | 0.57          | -           | -             | 1            | 0.09          | -          | -             | -              | 89            | 0.37 |
| <b>14.0</b>  | <b>total</b>              | <b>8</b>      | <b>100.00</b> | <b>14,477</b> | <b>100.00</b> | <b>19</b>   | <b>100.00</b> | <b>7,800</b>  | <b>100.00</b> | <b>3</b>         | <b>100.00</b> | <b>524</b>   | <b>100.00</b> | <b>5</b>    | <b>100.00</b> | <b>1,134</b> | <b>100.00</b> | <b>35</b>  | <b>100.00</b> | <b>23,935</b>  | <b>100.00</b> |      |
| Queens   | low                       | -             | -             | 201           | 0.81          | -           | -             | 147           | 0.58          | -                | -             | 16           | 0.57          | -           | -             | -            | -             | -          | -             | -              | 364           | 0.68 |
|  | moderate                  | 8             | 24.24         | 4,220         | 17.10         | 13          | 38.24         | 3,854         | 15.10         | 4                | 50.00         | 366          | 12.96         | 4           | 40.00         | 262          | 46.45         | 29         | 34.12         | 8,702          | 16.24         |      |
|  | middle                    | 18            | 54.55         | 12,539        | 50.81         | 16          | 47.06         | 13,312        | 52.17         | 4                | 50.00         | 1,519        | 53.79         | 3           | 30.00         | 246          | 43.62         | 41         | 48.24         | 27,616         | 51.54         |      |
|  | upper                     | 7             | 21.21         | 7,678         | 31.11         | 5           | 14.71         | 8,173         | 32.03         | -                | -             | 922          | 32.65         | 3           | 30.00         | 56           | 9.93          | 15         | 17.65         | 16,829         | 31.41         |      |
|  | zero & NAs                | -             | -             | 41            | 0.17          | -           | -             | 33            | 0.13          | -                | -             | 1            | 0.04          | -           | -             | -            | -             | -          | -             | -              | 75            | 0.14 |
| <b>34.0</b>  | <b>total</b>              | <b>33</b>     | <b>100.00</b> | <b>24,679</b> | <b>100.00</b> | <b>34</b>   | <b>100.00</b> | <b>25,519</b> | <b>100.00</b> | <b>8</b>         | <b>100.00</b> | <b>2,824</b> | <b>100.00</b> | <b>10</b>   | <b>100.00</b> | <b>564</b>   | <b>100.00</b> | <b>85</b>  | <b>100.00</b> | <b>53,586</b>  | <b>100.00</b> |      |
| Westchester*   | low                       | -             | -             | -             | -             | -           | -             | -             | -             | -                | -             | -            | -             | -           | -             | -            | -             | -          | -             | -              | -             |      |
|  | moderate                  | -             | -             | -             | -             | -           | -             | -             | -             | -                | -             | -            | -             | -           | -             | -            | -             | -          | -             | -              | -             |      |
|  | middle                    | -             | -             | 360           | 36.07         | 1           | 100.00        | 344           | 36.56         | -                | -             | 45           | 38.79         | -           | -             | 10           | 38.46         | 1          | 50.00         | 759            | 36.47         |      |
|  | upper                     | 1             | 100.00        | 638           | 63.93         | -           | -             | 597           | 63.44         | -                | -             | 71           | 61.21         | -           | -             | 16           | 61.54         | 1          | 50.00         | 1,322          | 63.53         |      |
|  | zero & NAs                | -             | -             | -             | -             | -           | -             | -             | -             | -                | -             | -            | -             | -           | -             | -            | -             | -          | -             | -              | -             |      |
| <b>0.8</b>   | <b>total</b>              | <b>1</b>      | <b>100.00</b> | <b>998</b>    | <b>100.00</b> | <b>1</b>    | <b>100.00</b> | <b>941</b>    | <b>100.00</b> | <b>-</b>         | <b>-</b>      | <b>116</b>   | <b>100.00</b> | <b>-</b>    | <b>-</b>      | <b>26</b>    | <b>100.00</b> | <b>2</b>   | <b>100.00</b> | <b>2,081</b>   | <b>100.00</b> |      |
| <b>A/A Total</b>                                       | low                       | 1             | 1.49          | 3,738         | 5.80          | 8           | 8.16          | 3,396         | 5.49          | 7                | 17.50         | 431          | 6.52          | 4           | 8.89          | 788          | 20.79         | 20         | 8.00          | 8,353          | 6.11          |      |
|  | moderate                  | 18            | 26.87         | 13,457        | 20.86         | 32          | 32.65         | 14,348        | 23.19         | 11               | 27.50         | 1,560        | 23.61         | 20          | 44.44         | 1,475        | 38.91         | 81         | 32.40         | 30,840         | 22.55         |      |
|  | middle                    | 27            | 40.30         | 21,317        | 33.05         | 27          | 27.55         | 23,293        | 37.65         | 18               | 45.00         | 2,672        | 40.45         | 14          | 31.11         | 635          | 16.75         | 86         | 34.40         | 47,917         | 35.04         |      |
|  | upper                     | 21            | 31.34         | 25,833        | 40.05         | 31          | 31.63         | 20,737        | 33.52         | 4                | 10.00         | 1,934        | 29.28         | 7           | 15.56         | 890          | 23.48         | 63         | 25.20         | 49,394         | 36.12         |      |
|  | zero & NAs                | -             | -             | 152           | 0.24          | -           | -             | 88            | 0.14          | -                | -             | 9            | 0.14          | -           | -             | 3            | 0.08          | -          | -             | 252            | 0.18          |      |
| <b>100.0</b>   | <b>total</b>              | <b>67</b>     | <b>100.00</b> | <b>64,497</b> | <b>100.00</b> | <b>98</b>   | <b>100.00</b> | <b>61,862</b> | <b>100.00</b> | <b>40</b>        | <b>100.00</b> | <b>6,606</b> | <b>100.00</b> | <b>45</b>   | <b>100.00</b> | <b>3,791</b> | <b>100.00</b> | <b>250</b> | <b>100.00</b> | <b>136,756</b> | <b>100.00</b> |      |

\* The bank takes only part of the county in its assessment area.

<sup>1</sup> Bank numbers include originated and purchased; Aggregate numbers include originated only.

Sources of data: Bank (bank loans within assessment area); and 2000 Census with 2004 tract definition (geography income levels).

| HMDA LOAN ORIGINATIONS <sup>1</sup>                    |                           |               |               |               |               |             |               |               |               |                  |               |              |               |             |               |              |               |            |               |                |               |
|--|---------------------------|---------------|---------------|---------------|---------------|-------------|---------------|---------------|---------------|------------------|---------------|--------------|---------------|-------------|---------------|--------------|---------------|------------|---------------|----------------|---------------|
| YEAR 2005  |                           |               |               |               |               |             |               |               |               |                  |               |              |               |             |               |              |               |            |               |                |               |
| GEOGRAPHY INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS |                           |               |               |               |               |             |               |               |               |                  |               |              |               |             |               |              |               |            |               |                |               |
| County/Area  | Geography<br>Income Level | Home Purchase |               |               |               | Refinancing |               |               |               | Home Improvement |               |              |               | Multifamily |               |              |               | Total      |               |                |               |
|  |                           | Bank #        | Bank %        | Agg. #        | Agg. %        | Bank #      | Bank %        | Agg. #        | Agg. %        | Bank #           | Bank %        | Agg. #       | Agg. %        | Bank #      | Bank %        | Agg. #       | Agg. %        | Bank #     | Bank %        | Agg. #         | Agg. %        |
| Bronx  | low                       | 5             | 27.78         | 1,277         | 16.20         | 7           | 33.33         | 1,227         | 17.13         | 11               | 37.93         | 172          | 17.32         | 1           | 25.00         | 232          | 48.64         | 24         | 33.33         | 2,908          | 17.61         |
|  | moderate                  | 9             | 50.00         | 2,397         | 30.41         | 5           | 23.81         | 1,975         | 27.58         | 11               | 37.93         | 267          | 26.89         | -           | -             | 176          | 36.90         | 25         | 34.72         | 4,815          | 29.16         |
|  | middle                    | 3             | 16.67         | 2,404         | 30.50         | 7           | 33.33         | 2,455         | 34.28         | 7                | 24.14         | 347          | 34.94         | 1           | 25.00         | 41           | 8.60          | 18         | 25.00         | 5,247          | 31.77         |
|  | upper                     | 1             | 5.56          | 1,800         | 22.84         | 2           | 9.52          | 1,502         | 20.97         | -                | -             | 206          | 20.75         | 2           | 50.00         | 28           | 5.87          | 5          | 6.94          | 3,536          | 21.41         |
|  | zero & NAs                | -             | -             | 4             | 0.05          | -           | -             | 2             | 0.03          | -                | -             | 1            | 0.10          | -           | -             | -            | -             | -          | -             | -              | 7             |
| <b>22.1</b>  | <b>total</b>              | <b>18</b>     | <b>100.00</b> | <b>7,882</b>  | <b>100.00</b> | <b>21</b>   | <b>100.00</b> | <b>7,161</b>  | <b>100.00</b> | <b>29</b>        | <b>100.00</b> | <b>993</b>   | <b>100.00</b> | <b>4</b>    | <b>100.00</b> | <b>477</b>   | <b>100.00</b> | <b>72</b>  | <b>100.00</b> | <b>16,513</b>  | <b>100.00</b> |
| Kings  | low                       | 8             | 28.57         | 2,607         | 12.54         | 1           | 4.17          | 1,988         | 10.23         | 4                | 10.26         | 190          | 8.18          | -           | -             | 342          | 23.27         | 13         | 13.13         | 5,127          | 11.65         |
|  | moderate                  | 7             | 25.00         | 7,825         | 37.63         | 11          | 45.83         | 7,633         | 39.29         | 20               | 51.28         | 905          | 38.98         | 3           | 37.50         | 747          | 50.82         | 41         | 41.41         | 17,110         | 38.87         |
|  | middle                    | 7             | 25.00         | 6,326         | 30.42         | 4           | 16.67         | 6,495         | 33.43         | 10               | 25.64         | 819          | 35.27         | 5           | 62.50         | 249          | 16.94         | 26         | 26.26         | 13,889         | 31.56         |
|  | upper                     | 6             | 21.43         | 4,029         | 19.38         | 8           | 33.33         | 3,305         | 17.01         | 5                | 12.82         | 406          | 17.48         | -           | -             | 131          | 8.91          | 19         | 19.19         | 7,871          | 17.88         |
|  | zero & NAs                | -             | -             | 7             | 0.03          | -           | -             | 8             | 0.04          | -                | -             | 2            | 0.09          | -           | -             | 1            | 0.07          | -          | -             | -              | 18            |
| <b>30.4</b>  | <b>total</b>              | <b>28</b>     | <b>100.00</b> | <b>20,794</b> | <b>100.00</b> | <b>24</b>   | <b>100.00</b> | <b>19,429</b> | <b>100.00</b> | <b>39</b>        | <b>100.00</b> | <b>2,322</b> | <b>100.00</b> | <b>8</b>    | <b>100.00</b> | <b>1,470</b> | <b>100.00</b> | <b>99</b>  | <b>100.00</b> | <b>44,015</b>  | <b>100.00</b> |
| New York   | low                       | 2             | 40.00         | 571           | 4.41          | 1           | 11.11         | 250           | 4.08          | 2                | 22.22         | 48           | 6.91          | -           | -             | 148          | 14.18         | 5          | 20.83         | 1,017          | 4.89          |
|  | moderate                  | 1             | 20.00         | 1,119         | 8.65          | 3           | 33.33         | 590           | 9.63          | 4                | 44.44         | 104          | 14.96         | 1           | 100.00        | 242          | 23.18         | 9          | 37.50         | 2,055          | 9.87          |
|  | middle                    | -             | -             | 591           | 4.57          | -           | -             | 301           | 4.91          | 1                | 11.11         | 45           | 6.47          | -           | -             | 76           | 7.28          | 1          | 4.17          | 1,013          | 4.87          |
|  | upper                     | 2             | 40.00         | 10,620        | 82.05         | 5           | 55.56         | 4,972         | 81.12         | 2                | 22.22         | 498          | 71.65         | -           | -             | 577          | 55.27         | 9          | 37.50         | 16,667         | 80.09         |
|  | zero & NAs                | -             | -             | 42            | 0.32          | -           | -             | 16            | 0.26          | -                | -             | -            | -             | -           | -             | 1            | 0.10          | -          | -             | -              | 59            |
| <b>7.4</b>   | <b>total</b>              | <b>5</b>      | <b>100.00</b> | <b>12,943</b> | <b>100.00</b> | <b>9</b>    | <b>100.00</b> | <b>6,129</b>  | <b>100.00</b> | <b>9</b>         | <b>100.00</b> | <b>695</b>   | <b>100.00</b> | <b>1</b>    | <b>100.00</b> | <b>1,044</b> | <b>100.00</b> | <b>24</b>  | <b>100.00</b> | <b>20,811</b>  | <b>100.00</b> |
| Queens   | low                       | -             | -             | 272           | 0.94          | 1           | 2.22          | 142           | 0.59          | -                | -             | 23           | 0.71          | -           | -             | 3            | 0.61          | 1          | 0.77          | 440            | 0.77          |
|  | moderate                  | 16            | 39.02         | 5,213         | 17.96         | 13          | 28.89         | 3,856         | 16.00         | 15               | 37.50         | 498          | 15.38         | 1           | 25.00         | 264          | 53.55         | 45         | 34.62         | 9,831          | 17.29         |
|  | middle                    | 20            | 48.78         | 15,478        | 53.32         | 26          | 57.78         | 12,803        | 53.12         | 20               | 50.00         | 1,646        | 50.85         | 2           | 50.00         | 185          | 37.53         | 68         | 52.31         | 30,112         | 52.96         |
|  | upper                     | 4             | 9.76          | 8,047         | 27.72         | 5           | 11.11         | 7,282         | 30.22         | 5                | 12.50         | 1,070        | 33.06         | 1           | 25.00         | 39           | 7.91          | 15         | 11.54         | 16,438         | 28.91         |
|  | zero & NAs                | 1             | 2.44          | 20            | 0.07          | -           | -             | 17            | 0.07          | -                | -             | -            | -             | -           | -             | 2            | 0.41          | 1          | 0.77          | 39             | 0.07          |
| <b>39.9</b>  | <b>total</b>              | <b>41</b>     | <b>100.00</b> | <b>29,030</b> | <b>100.00</b> | <b>45</b>   | <b>100.00</b> | <b>24,100</b> | <b>100.00</b> | <b>40</b>        | <b>100.00</b> | <b>3,237</b> | <b>100.00</b> | <b>4</b>    | <b>100.00</b> | <b>493</b>   | <b>100.00</b> | <b>130</b> | <b>100.00</b> | <b>56,860</b>  | <b>100.00</b> |
| Westchester*   | low                       | -             | -             | -             | -             | -           | -             | -             | -             | -                | -             | -            | -             | -           | -             | -            | -             | -          | -             | -              | -             |
|  | moderate                  | -             | -             | -             | -             | -           | -             | -             | -             | -                | -             | -            | -             | -           | -             | -            | -             | -          | -             | -              | -             |
|  | middle                    | -             | -             | 279           | 28.53         | -           | -             | 311           | 37.74         | -                | -             | 54           | 43.90         | -           | -             | 21           | 72.41         | -          | -             | 665            | 34.03         |
|  | upper                     | -             | -             | 698           | 71.37         | 1           | 100.00        | 513           | 62.26         | -                | -             | 69           | 56.10         | -           | -             | 8            | 27.59         | 1          | 100.00        | 1,288          | 65.92         |
|  | zero & NAs                | -             | -             | 1             | 0.10          | -           | -             | -             | -             | -                | -             | -            | -             | -           | -             | -            | -             | -          | -             | 1              | 0.05          |
| <b>0.3</b>   | <b>total</b>              | <b>-</b>      | <b>-</b>      | <b>978</b>    | <b>100.00</b> | <b>1</b>    | <b>100.00</b> | <b>824</b>    | <b>100.00</b> | <b>-</b>         | <b>-</b>      | <b>123</b>   | <b>100.00</b> | <b>-</b>    | <b>-</b>      | <b>29</b>    | <b>100.00</b> | <b>1</b>   | <b>100.00</b> | <b>1,954</b>   | <b>100.00</b> |
| <b>A/A Total</b>                                       | low                       | 15            | 16.30         | 4,727         | 6.60          | 10          | 10.00         | 3,607         | 6.26          | 17               | 14.53         | 433          | 5.88          | 1           | 5.88          | 725          | 20.64         | 43         | 13.19         | 9,492          | 6.77          |
|  | moderate                  | 33            | 35.87         | 16,554        | 23.11         | 32          | 32.00         | 14,054        | 24.38         | 50               | 42.74         | 1,774        | 24.07         | 5           | 29.41         | 1,429        | 40.68         | 120        | 36.81         | 33,811         | 24.12         |
|  | middle                    | 30            | 32.61         | 25,078        | 35.01         | 37          | 37.00         | 22,365        | 38.80         | 38               | 32.48         | 2,911        | 39.50         | 8           | 47.06         | 572          | 16.28         | 113        | 34.66         | 50,926         | 36.34         |
|  | upper                     | 13            | 14.13         | 25,194        | 35.17         | 21          | 21.00         | 17,574        | 30.49         | 12               | 10.26         | 2,249        | 30.52         | 3           | 17.65         | 783          | 22.29         | 49         | 15.03         | 45,800         | 32.68         |
|  | zero & NAs                | 1             | 1.09          | 74            | 0.10          | -           | -             | 43            | 0.07          | -                | -             | 3            | 0.04          | -           | -             | 4            | 0.11          | 1          | 0.31          | 124            | 0.09          |
| <b>100.0</b>   | <b>total</b>              | <b>92</b>     | <b>100.00</b> | <b>71,627</b> | <b>100.00</b> | <b>100</b>  | <b>100.00</b> | <b>57,643</b> | <b>100.00</b> | <b>117</b>       | <b>100.00</b> | <b>7,370</b> | <b>100.00</b> | <b>17</b>   | <b>100.00</b> | <b>3,513</b> | <b>100.00</b> | <b>326</b> | <b>100.00</b> | <b>140,153</b> | <b>100.00</b> |

\* The bank takes only part of the county in its assessment area.

<sup>1</sup> Bank numbers include originated and purchased; Aggregate numbers include originated only.

Sources of data: Bank (bank loans within assessment area); and 2000 Census with 2004 tract definition (geography income levels).

| HMDA LOAN ORIGINATIONS <sup>1</sup>  |                           |               |               |                   |               |               |               |                   |               |                  |               |                  |               |               |               |                  |               |               |               |                   |               |      |
|--|---------------------------|---------------|---------------|-------------------|---------------|---------------|---------------|-------------------|---------------|------------------|---------------|------------------|---------------|---------------|---------------|------------------|---------------|---------------|---------------|-------------------|---------------|------|
| YEAR 2004  |                           |               |               |                   |               |               |               |                   |               |                  |               |                  |               |               |               |                  |               |               |               |                   |               |      |
| GEOGRAPHY INCOME LEVEL DISTRIBUTION -- VOLUME OF LOANS IN THOUSANDS OF DOLLARS |                           |               |               |                   |               |               |               |                   |               |                  |               |                  |               |               |               |                  |               |               |               |                   |               |      |
| County/Area  | Geography<br>Income Level | Home Purchase |               |                   |               | Refinancing   |               |                   |               | Home Improvement |               |                  |               | Multifamily   |               |                  | Total         |               |               |                   |               |      |
|  |                           | Bank \$       | Bank %        | Agg. \$           | Agg. %        | Bank \$       | Bank %        | Agg. \$           | Agg. %        | Bank \$          | Bank %        | Agg. \$          | Agg. %        | Bank \$       | Bank %        | Agg. \$          | Agg. %        | Bank \$       | Bank %        | Agg. \$           | Agg. %        |      |
| Bronx  | low                       | -             | -             | 260,337           | 17.33         | 540           | 20.83         | 251,616           | 14.88         | 68               | 12.19         | 16,954           | 16.24         | 20            | 2.88          | 471,631          | 42.66         | 628           | 9.48          | 1,000,538         | 22.72         |      |
|  | moderate                  | 399           | 14.36         | 383,912           | 25.55         | 541           | 20.87         | 468,083           | 27.67         | 10               | 1.79          | 27,586           | 26.42         | 365           | 52.52         | 307,320          | 27.80         | 1,315         | 19.85         | 1,186,901         | 26.95         |      |
|  | middle                    | 1,460         | 52.54         | 456,098           | 30.36         | 613           | 23.65         | 595,093           | 35.18         | 470              | 84.23         | 40,116           | 38.42         | 310           | 44.60         | 286,139          | 25.88         | 2,853         | 43.07         | 1,377,446         | 31.28         |      |
|  | upper                     | 920           | 33.11         | 398,103           | 26.50         | 898           | 34.65         | 375,856           | 22.22         | 10               | 1.79          | 19,752           | 18.92         | -             | -             | 40,405           | 3.65          | 1,828         | 27.60         | 834,116           | 18.94         |      |
|  | zero & NAs                | -             | -             | 4,021             | 0.27          | -             | -             | 744               | 0.04          | -                | -             | 6                | 0.01          | -             | -             | -                | -             | -             | -             | -                 | 4,771         | 0.11 |
| <b>11.5</b>  | <b>total</b>              | <b>2,779</b>  | <b>100.00</b> | <b>1,502,471</b>  | <b>100.00</b> | <b>2,592</b>  | <b>100.00</b> | <b>1,691,392</b>  | <b>100.00</b> | <b>558</b>       | <b>100.00</b> | <b>104,414</b>   | <b>100.00</b> | <b>695</b>    | <b>100.00</b> | <b>1,105,495</b> | <b>100.00</b> | <b>6,624</b>  | <b>100.00</b> | <b>4,403,772</b>  | <b>100.00</b> |      |
| Kings  | low                       | -             | -             | 532,717           | 9.97          | 721           | 20.95         | 487,122           | 9.08          | 5                | 0.30          | 30,691           | 8.95          | 180           | 1.52          | 222,719          | 20.51         | 906           | 4.59          | 1,273,249         | 10.49         |      |
|  | moderate                  | 1,129         | 40.16         | 1,864,819         | 34.91         | 1,075         | 31.24         | 2,040,642         | 38.02         | 180              | 10.92         | 133,262          | 38.87         | 9,089         | 76.74         | 532,856          | 49.07         | 11,473        | 58.11         | 4,571,579         | 37.66         |      |
|  | middle                    | 282           | 10.03         | 1,661,033         | 31.09         | 934           | 27.14         | 1,770,526         | 32.99         | 1,339            | 81.20         | 114,619          | 33.43         | 300           | 2.53          | 204,751          | 18.86         | 2,855         | 14.46         | 3,750,929         | 30.90         |      |
|  | upper                     | 1,400         | 49.80         | 1,273,870         | 23.84         | 711           | 20.66         | 1,064,067         | 19.83         | 125              | 7.58          | 63,688           | 18.58         | 2,275         | 19.21         | 122,165          | 11.25         | 4,511         | 22.85         | 2,523,790         | 20.79         |      |
|  | zero & NAs                | -             | -             | 9,877             | 0.18          | -             | -             | 4,614             | 0.09          | -                | -             | 604              | 0.18          | -             | -             | 3,420            | 0.31          | -             | -             | -                 | 18,515        | 0.15 |
| <b>34.2</b>  | <b>total</b>              | <b>2,811</b>  | <b>100.00</b> | <b>5,342,316</b>  | <b>100.00</b> | <b>3,441</b>  | <b>100.00</b> | <b>5,366,971</b>  | <b>100.00</b> | <b>1,649</b>     | <b>100.00</b> | <b>342,864</b>   | <b>100.00</b> | <b>11,844</b> | <b>100.00</b> | <b>1,085,911</b> | <b>100.00</b> | <b>19,745</b> | <b>100.00</b> | <b>12,138,062</b> | <b>100.00</b> |      |
| New York   | low                       | 96            | 2.99          | 159,876           | 2.24          | 25            | 0.60          | 75,530            | 2.32          | 10               | 2.51          | 5,124            | 3.25          | -             | -             | 363,259          | 11.62         | 131           | 0.82          | 603,789           | 4.42          |      |
|  | moderate                  | -             | -             | 303,518           | 4.25          | 272           | 6.56          | 196,301           | 6.04          | 150              | 37.69         | 9,905            | 6.29          | -             | -             | 541,906          | 17.34         | 422           | 2.65          | 1,051,630         | 7.69          |      |
|  | middle                    | -             | -             | 197,186           | 2.76          | -             | -             | 86,405            | 2.66          | -                | -             | 7,037            | 4.47          | 8,050         | 98.68         | 375,858          | 12.03         | 8,050         | 50.61         | 666,486           | 4.87          |      |
|  | upper                     | 3,110         | 97.01         | 6,429,482         | 90.01         | 3,847         | 92.83         | 2,861,861         | 88.09         | 238              | 59.80         | 135,128          | 85.78         | 108           | 1.32          | 1,840,553        | 58.89         | 7,303         | 45.91         | 11,267,024        | 82.39         |      |
|  | zero & NAs                | -             | -             | 52,622            | 0.74          | -             | -             | 28,753            | 0.89          | -                | -             | 342              | 0.22          | -             | -             | 4,000            | 0.13          | -             | -             | -                 | 85,717        | 0.63 |
| <b>27.5</b>  | <b>total</b>              | <b>3,206</b>  | <b>100.00</b> | <b>7,142,684</b>  | <b>100.00</b> | <b>4,144</b>  | <b>100.00</b> | <b>3,248,850</b>  | <b>100.00</b> | <b>398</b>       | <b>100.00</b> | <b>157,536</b>   | <b>100.00</b> | <b>8,158</b>  | <b>100.00</b> | <b>3,125,576</b> | <b>100.00</b> | <b>15,906</b> | <b>100.00</b> | <b>13,674,646</b> | <b>100.00</b> |      |
| Queens   | low                       | -             | -             | 50,542            | 0.78          | -             | -             | 32,301            | 0.52          | -                | -             | 1,122            | 0.30          | -             | -             | -                | -             | -             | -             | -                 | 83,965        | 0.61 |
|  | moderate                  | 721           | 9.70          | 1,139,582         | 17.58         | 2,189         | 36.53         | 1,044,251         | 16.83         | 341              | 54.30         | 55,257           | 14.74         | 275           | 24.12         | 311,494          | 44.05         | 3,526         | 23.20         | 2,550,584         | 18.53         |      |
|  | middle                    | 4,200         | 56.48         | 3,190,942         | 49.23         | 2,928         | 48.86         | 3,182,826         | 51.30         | 287              | 45.70         | 195,835          | 52.24         | 680           | 59.65         | 295,363          | 41.76         | 8,095         | 53.27         | 6,864,966         | 49.86         |      |
|  | upper                     | 2,515         | 33.82         | 2,087,192         | 32.20         | 876           | 14.62         | 1,937,244         | 31.22         | -                | -             | 122,625          | 32.71         | 185           | 16.23         | 100,360          | 14.19         | 3,576         | 23.53         | 4,247,421         | 30.85         |      |
|  | zero & NAs                | -             | -             | 13,531            | 0.21          | -             | -             | 7,827             | 0.13          | -                | -             | 8                | 0.00          | -             | -             | -                | -             | -             | -             | -                 | 21,366        | 0.16 |
| <b>26.3</b>  | <b>total</b>              | <b>7,436</b>  | <b>100.00</b> | <b>6,481,789</b>  | <b>100.00</b> | <b>5,993</b>  | <b>100.00</b> | <b>6,204,449</b>  | <b>100.00</b> | <b>628</b>       | <b>100.00</b> | <b>374,847</b>   | <b>100.00</b> | <b>1,140</b>  | <b>100.00</b> | <b>707,217</b>   | <b>100.00</b> | <b>15,197</b> | <b>100.00</b> | <b>13,768,302</b> | <b>100.00</b> |      |
| Westchester*   | low                       | -             | -             | -                 | -             | -             | -             | -                 | -             | -                | -             | -                | -             | -             | -             | -                | -             | -             | -             | -                 | -             |      |
|  | moderate                  | -             | -             | -                 | -             | -             | -             | -                 | -             | -                | -             | -                | -             | -             | -             | -                | -             | -             | -             | -                 | -             |      |
|  | middle                    | -             | -             | 99,943            | 30.21         | 230           | 100.00        | 92,435            | 33.35         | -                | -             | 8,050            | 38.94         | -             | -             | 9,119            | 26.90         | 230           | 81.56         | 209,547           | 31.63         |      |
|  | upper                     | 52            | 100.00        | 230,845           | 69.79         | -             | -             | 184,740           | 66.65         | -                | -             | 12,624           | 61.06         | -             | -             | 24,777           | 73.10         | 52            | 18.44         | 452,986           | 68.37         |      |
|  | zero & NAs                | -             | -             | -                 | -             | -             | -             | -                 | -             | -                | -             | -                | -             | -             | -             | -                | -             | -             | -             | -                 | -             |      |
| <b>0.5</b>   | <b>total</b>              | <b>52</b>     | <b>100.00</b> | <b>330,788</b>    | <b>100.00</b> | <b>230</b>    | <b>100.00</b> | <b>277,175</b>    | <b>100.00</b> | <b>-</b>         | <b>-</b>      | <b>20,674</b>    | <b>100.00</b> | <b>-</b>      | <b>-</b>      | <b>33,896</b>    | <b>100.00</b> | <b>282</b>    | <b>100.00</b> | <b>662,533</b>    | <b>100.00</b> |      |
| <b>A/A Total</b>   | low                       | 96            | 0.59          | 1,003,472         | 4.82          | 1,286         | 7.84          | 846,569           | 5.04          | 83               | 2.57          | 53,891           | 5.39          | 200           | 0.92          | 1,057,609        | 17.46         | 1,665         | 2.88          | 2,961,541         | 6.63          |      |
|  | moderate                  | 2,249         | 13.81         | 3,691,831         | 17.75         | 4,077         | 24.86         | 3,749,277         | 22.33         | 681              | 21.06         | 226,010          | 22.59         | 9,729         | 44.55         | 1,693,576        | 27.96         | 16,736        | 28.98         | 9,360,694         | 20.97         |      |
|  | middle                    | 5,942         | 36.49         | 5,605,202         | 26.95         | 4,705         | 28.69         | 5,727,285         | 34.11         | 2,096            | 64.83         | 365,657          | 36.55         | 9,340         | 42.77         | 1,171,230        | 19.33         | 22,083        | 38.24         | 12,869,374        | 28.82         |      |
|  | upper                     | 7,997         | 49.11         | 10,419,492        | 50.09         | 6,332         | 38.61         | 6,423,768         | 38.26         | 373              | 11.54         | 353,817          | 35.37         | 2,568         | 11.76         | 2,128,260        | 35.13         | 17,270        | 29.90         | 19,325,337        | 43.28         |      |
|  | zero & NAs                | -             | -             | 80,051            | 0.38          | -             | -             | 41,938            | 0.25          | -                | -             | 960              | 0.10          | -             | -             | 7,420            | 0.12          | -             | -             | 130,369           | 0.29          |      |
| <b>100.0</b>   | <b>total</b>              | <b>16,284</b> | <b>100.00</b> | <b>20,800,048</b> | <b>100.00</b> | <b>16,400</b> | <b>100.00</b> | <b>16,788,837</b> | <b>100.00</b> | <b>3,233</b>     | <b>100.00</b> | <b>1,000,335</b> | <b>100.00</b> | <b>21,837</b> | <b>100.00</b> | <b>6,058,095</b> | <b>100.00</b> | <b>57,754</b> | <b>100.00</b> | <b>44,647,315</b> | <b>100.00</b> |      |

\* The bank takes only part of the county in its assessment area.

<sup>1</sup> Bank numbers include originated and purchased; Aggregate numbers include originated only.

Sources of data: Bank (bank loans within assessment area); and 2000 Census with 2004 tract definition (geography income levels).

| HMDA LOAN ORIGINATIONS <sup>1</sup>  |                           |               |               |                   |               |               |               |                   |               |                  |               |                  |               |              |               |                  |               |               |               |                   |               |
|--|---------------------------|---------------|---------------|-------------------|---------------|---------------|---------------|-------------------|---------------|------------------|---------------|------------------|---------------|--------------|---------------|------------------|---------------|---------------|---------------|-------------------|---------------|
| YEAR 2005  |                           |               |               |                   |               |               |               |                   |               |                  |               |                  |               |              |               |                  |               |               |               |                   |               |
| GEOGRAPHY INCOME LEVEL DISTRIBUTION -- VOLUME OF LOANS IN THOUSANDS OF DOLLARS |                           |               |               |                   |               |               |               |                   |               |                  |               |                  |               |              |               |                  |               |               |               |                   |               |
| County/Area  | Geography<br>Income Level | Home Purchase |               |                   |               | Refinancing   |               |                   |               | Home Improvement |               |                  |               | Multifamily  |               |                  |               | Total         |               |                   |               |
|  |                           | Bank \$       | Bank %        | Agg. \$           | Agg. %        | Bank \$       | Bank %        | Agg. \$           | Agg. %        | Bank \$          | Bank %        | Agg. \$          | Agg. %        | Bank \$      | Bank %        | Agg. \$          | Agg. %        | Bank \$       | Bank %        | Agg. \$           | Agg. %        |
| Bronx  | low                       | 1,495         | 38.68         | 319,638           | 17.22         | 1,855         | 41.31         | 329,011           | 17.14         | 427              | 31.68         | 22,344           | 16.86         | 300          | 17.12         | 358,014          | 43.83         | 4,077         | 35.59         | 1,029,007         | 21.78         |
|  | moderate                  | 1,111         | 28.75         | 484,355           | 26.10         | 997           | 22.20         | 517,063           | 26.93         | 389              | 28.86         | 34,508           | 26.03         | -            | -             | 344,330          | 42.15         | 2,497         | 21.80         | 1,380,256         | 29.21         |
|  | middle                    | 803           | 20.78         | 581,700           | 31.34         | 1,327         | 29.55         | 681,178           | 35.48         | 532              | 39.47         | 49,933           | 37.67         | 87           | 4.97          | 60,087           | 7.36          | 2,749         | 24.00         | 1,372,898         | 29.05         |
|  | upper                     | 456           | 11.80         | 469,274           | 25.29         | 311           | 6.93          | 392,004           | 20.42         | -                | -             | 25,754           | 19.43         | 1,365        | 77.91         | 54,479           | 6.67          | 2,132         | 18.61         | 941,511           | 19.92         |
|  | zero & NAs                | -             | -             | 891               | 0.05          | -             | -             | 820               | 0.04          | -                | -             | 8                | 0.01          | -            | -             | -                | -             | -             | -             | -                 | 1,719         |
| <b>16.1</b>  | <b>total</b>              | <b>3,865</b>  | <b>100.00</b> | <b>1,855,858</b>  | <b>100.00</b> | <b>4,490</b>  | <b>100.00</b> | <b>1,920,076</b>  | <b>100.00</b> | <b>1,348</b>     | <b>100.00</b> | <b>132,547</b>   | <b>100.00</b> | <b>1,752</b> | <b>100.00</b> | <b>816,910</b>   | <b>100.00</b> | <b>11,455</b> | <b>100.00</b> | <b>4,725,391</b>  | <b>100.00</b> |
| Kings  | low                       | 2,468         | 31.64         | 776,046           | 11.51         | 120           | 2.17          | 618,087           | 10.12         | 155              | 4.24          | 31,950           | 8.01          | -            | -             | 252,518          | 18.51         | 2,743         | 13.45         | 1,678,601         | 11.49         |
|  | moderate                  | 1,651         | 21.16         | 2,446,806         | 36.29         | 2,380         | 43.00         | 2,409,199         | 39.45         | 2,355            | 64.47         | 152,809          | 38.32         | 1,740        | 51.07         | 771,994          | 56.60         | 8,126         | 39.84         | 5,780,808         | 39.56         |
|  | middle                    | 1,954         | 25.05         | 1,971,533         | 29.24         | 1,035         | 18.70         | 1,980,445         | 32.43         | 613              | 16.78         | 140,875          | 35.33         | 1,667        | 48.93         | 213,086          | 15.62         | 5,269         | 25.83         | 4,305,939         | 29.47         |
|  | upper                     | 1,728         | 22.15         | 1,545,592         | 22.93         | 2,000         | 36.13         | 1,096,967         | 17.96         | 530              | 14.51         | 73,043           | 18.32         | -            | -             | 113,205          | 8.30          | 4,258         | 20.88         | 2,828,807         | 19.36         |
|  | zero & NAs                | -             | -             | 1,798             | 0.03          | -             | -             | 1,872             | 0.03          | -                | -             | 104              | 0.03          | -            | -             | 13,145           | 0.96          | -             | -             | 16,919            | 0.12          |
| <b>28.6</b>  | <b>total</b>              | <b>7,801</b>  | <b>100.00</b> | <b>6,741,775</b>  | <b>100.00</b> | <b>5,535</b>  | <b>100.00</b> | <b>6,106,570</b>  | <b>100.00</b> | <b>3,653</b>     | <b>100.00</b> | <b>398,781</b>   | <b>100.00</b> | <b>3,407</b> | <b>100.00</b> | <b>1,363,948</b> | <b>100.00</b> | <b>20,396</b> | <b>100.00</b> | <b>14,611,074</b> | <b>100.00</b> |
| New York   | low                       | 720           | 41.84         | 211,709           | 2.76          | 136           | 7.42          | 100,602           | 3.13          | 248              | 80.00         | 7,937            | 3.80          | -            | -             | 351,554          | 10.67         | 1,104         | 24.45         | 671,802           | 4.67          |
|  | moderate                  | 320           | 18.59         | 447,664           | 5.84          | 205           | 11.18         | 199,701           | 6.21          | 19               | 6.13          | 15,079           | 7.23          | 650          | 100.00        | 547,941          | 16.63         | 1,194         | 26.45         | 1,210,385         | 8.42          |
|  | middle                    | -             | -             | 227,782           | 2.97          | -             | -             | 97,097            | 3.02          | 8                | 2.58          | 11,346           | 5.44          | -            | -             | 242,925          | 7.37          | 8             | 0.18          | 579,150           | 4.03          |
|  | upper                     | 681           | 39.57         | 6,741,471         | 87.97         | 1,493         | 81.41         | 2,806,749         | 87.33         | 35               | 11.29         | 174,319          | 83.53         | -            | -             | 2,149,836        | 65.25         | 2,209         | 48.93         | 11,872,375        | 82.56         |
|  | zero & NAs                | -             | -             | 34,840            | 0.45          | -             | -             | 9,809             | 0.31          | -                | -             | -                | -             | -            | -             | 2,360            | 0.07          | -             | -             | 47,009            | 0.33          |
| <b>6.3</b>   | <b>total</b>              | <b>1,721</b>  | <b>100.00</b> | <b>7,663,466</b>  | <b>100.00</b> | <b>1,834</b>  | <b>100.00</b> | <b>3,213,958</b>  | <b>100.00</b> | <b>310</b>       | <b>100.00</b> | <b>208,681</b>   | <b>100.00</b> | <b>650</b>   | <b>100.00</b> | <b>3,294,616</b> | <b>100.00</b> | <b>4,515</b>  | <b>100.00</b> | <b>14,380,721</b> | <b>100.00</b> |
| Queens   | low                       | -             | -             | 64,272            | 0.79          | 261           | 1.84          | 37,248            | 0.54          | -                | -             | 3,090            | 0.64          | -            | -             | 1,133            | 0.14          | 261           | 0.75          | 105,743           | 0.65          |
|  | moderate                  | 4,306         | 38.20         | 1,493,138         | 18.37         | 3,787         | 26.67         | 1,205,518         | 17.52         | 2,267            | 32.19         | 86,593           | 17.80         | 60           | 2.81          | 388,130          | 48.54         | 10,420        | 30.07         | 3,173,379         | 19.48         |
|  | middle                    | 5,338         | 47.36         | 4,128,301         | 50.80         | 8,612         | 60.66         | 3,587,177         | 52.13         | 4,046            | 57.46         | 239,879          | 49.30         | 728          | 34.05         | 298,076          | 37.27         | 18,724        | 54.04         | 8,253,433         | 50.65         |
|  | upper                     | 1,223         | 10.85         | 2,435,226         | 29.97         | 1,538         | 10.83         | 2,047,452         | 29.75         | 729              | 10.35         | 156,990          | 32.27         | 1,350        | 63.14         | 111,628          | 13.96         | 4,840         | 13.97         | 4,751,296         | 29.16         |
|  | zero & NAs                | 405           | 3.59          | 5,745             | 0.07          | -             | -             | 4,196             | 0.06          | -                | -             | -                | -             | -            | -             | 721              | 0.09          | 405           | 1.17          | 10,662            | 0.07          |
| <b>48.6</b>  | <b>total</b>              | <b>11,272</b> | <b>100.00</b> | <b>8,126,682</b>  | <b>100.00</b> | <b>14,198</b> | <b>100.00</b> | <b>6,881,591</b>  | <b>100.00</b> | <b>7,042</b>     | <b>100.00</b> | <b>486,552</b>   | <b>100.00</b> | <b>2,138</b> | <b>100.00</b> | <b>799,688</b>   | <b>100.00</b> | <b>34,650</b> | <b>100.00</b> | <b>16,294,513</b> | <b>100.00</b> |
| Westchester*   | low                       | -             | -             | -                 | -             | -             | -             | -                 | -             | -                | -             | -                | -             | -            | -             | -                | -             | -             | -             | -                 | -             |
|  | moderate                  | -             | -             | -                 | -             | -             | -             | -                 | -             | -                | -             | -                | -             | -            | -             | -                | -             | -             | -             | -                 | -             |
|  | middle                    | -             | -             | 87,435            | 24.59         | -             | -             | 93,349            | 34.14         | -                | -             | 9,932            | 39.41         | -            | -             | 57,716           | 53.56         | -             | -             | 248,432           | 32.61         |
|  | upper                     | -             | -             | 267,694           | 75.29         | 350           | 100.00        | 180,048           | 65.86         | -                | -             | 15,271           | 60.59         | -            | -             | 50,034           | 46.44         | 350           | 100.00        | 513,047           | 67.34         |
|  | zero & NAs                | -             | -             | 444               | 0.12          | -             | -             | -                 | -             | -                | -             | -                | -             | -            | -             | -                | -             | -             | -             | 444               | 0.06          |
| <b>0.5</b>   | <b>total</b>              | <b>-</b>      | <b>-</b>      | <b>355,573</b>    | <b>100.00</b> | <b>350</b>    | <b>100.00</b> | <b>273,397</b>    | <b>100.00</b> | <b>-</b>         | <b>-</b>      | <b>25,203</b>    | <b>100.00</b> | <b>-</b>     | <b>-</b>      | <b>107,750</b>   | <b>100.00</b> | <b>350</b>    | <b>100.00</b> | <b>761,923</b>    | <b>100.00</b> |
| <b>A/A Total</b>   | low                       | 4,683         | 18.99         | 1,371,665         | 5.54          | 2,372         | 8.98          | 1,084,948         | 5.90          | 830              | 6.72          | 65,321           | 5.22          | 300          | 3.78          | 963,219          | 15.09         | 8,185         | 11.47         | 3,485,153         | 6.86          |
|  | moderate                  | 7,388         | 29.96         | 4,871,963         | 19.69         | 7,369         | 27.91         | 4,331,481         | 23.55         | 5,030            | 40.72         | 288,989          | 23.09         | 2,450        | 30.83         | 2,052,395        | 32.15         | 22,237        | 31.16         | 11,544,828        | 22.74         |
|  | middle                    | 8,095         | 32.83         | 6,996,751         | 28.28         | 10,974        | 41.56         | 6,439,246         | 35.00         | 5,199            | 42.09         | 451,965          | 36.11         | 2,482        | 31.23         | 871,890          | 13.66         | 26,750        | 37.48         | 14,759,852        | 29.07         |
|  | upper                     | 4,088         | 16.58         | 11,459,257        | 46.31         | 5,692         | 21.55         | 6,523,220         | 35.46         | 1,294            | 10.48         | 445,377          | 35.58         | 2,715        | 34.16         | 2,479,182        | 38.84         | 13,789        | 19.32         | 20,907,036        | 41.18         |
|  | zero & NAs                | 405           | 1.64          | 43,718            | 0.18          | -             | -             | 16,697            | 0.09          | -                | -             | 112              | 0.01          | -            | -             | 16,226           | 0.25          | 405           | 0.57          | 76,753            | 0.15          |
| <b>100.0</b>   | <b>total</b>              | <b>24,659</b> | <b>100.00</b> | <b>24,743,354</b> | <b>100.00</b> | <b>26,407</b> | <b>100.00</b> | <b>18,395,592</b> | <b>100.00</b> | <b>12,353</b>    | <b>100.00</b> | <b>1,251,764</b> | <b>100.00</b> | <b>7,947</b> | <b>100.00</b> | <b>6,382,912</b> | <b>100.00</b> | <b>71,366</b> | <b>100.00</b> | <b>50,773,622</b> | <b>100.00</b> |

\* The bank takes only part of the county in its assessment area.

<sup>1</sup> Bank numbers include originated and purchased; Aggregate numbers include originated only.

Sources of data: Bank (bank loans within assessment area); and 2000 Census with 2004 tract definition (geography income levels).

| 1-4 FAMILY HMDA LOAN ORIGINATIONS <sup>1</sup>        |                                  |              |               |           |               |               |               |           |               |               |                  |           |               |              |               |            |               |                |
|---|----------------------------------|--------------|---------------|-----------|---------------|---------------|---------------|-----------|---------------|---------------|------------------|-----------|---------------|--------------|---------------|------------|---------------|----------------|
| YEAR 2004   |                                  |              |               |           |               |               |               |           |               |               |                  |           |               |              |               |            |               |                |
| BORROWER INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS |                                  |              |               |           |               |               |               |           |               |               |                  |           |               |              |               |            |               |                |
| County/Area   | Borrower<br>% of Total A/A Loans | Income Level | Home Purchase |           |               |               | Refinancing   |           |               |               | Home Improvement |           |               |              | Total         |            |               |                |
|   |                                  |              | Bank #        | Bank %    | Agg. #        | Agg. %        | Bank #        | Bank %    | Agg. #        | Agg. %        | Bank #           | Bank %    | Agg. #        | Agg. %       | Bank #        | Bank %     | Agg. #        | Agg. %         |
| Bronx   | low                              |              | 2             | 11.76     | 105           | 1.62          | 2             | 9.09      | 151           | 2.04          | 4                | 36.36     | 56            | 5.71         | 8             | 16.00      | 312           | 2.10           |
|   | moderate                         |              | 2             | 11.76     | 570           | 8.81          | 7             | 31.82     | 745           | 10.09         | -                | -         | 135           | 13.76        | 9             | 18.00      | 1,450         | 9.77           |
|   | middle                           |              | 5             | 29.41     | 1,412         | 21.83         | 5             | 22.73     | 1,927         | 26.09         | 3                | 27.27     | 279           | 28.44        | 13            | 26.00      | 3,618         | 24.39          |
|   | upper                            |              | 6             | 35.29     | 4,019         | 62.14         | 8             | 36.36     | 4,017         | 54.39         | 4                | 36.36     | 479           | 48.83        | 18            | 36.00      | 8,515         | 57.40          |
|   | zero & NAs                       |              | 2             | 11.76     | 362           | 5.60          | -             | -         | 545           | 7.38          | -                | -         | 32            | 3.26         | 2             | 4.00       | 939           | 6.33           |
|   | <b>24.4</b>                      | <b>total</b> |               | <b>17</b> | <b>100.00</b> | <b>6,468</b>  | <b>100.00</b> | <b>22</b> | <b>100.00</b> | <b>7,385</b>  | <b>100.00</b>    | <b>11</b> | <b>100.00</b> | <b>981</b>   | <b>100.00</b> | <b>50</b>  | <b>100.00</b> | <b>14,834</b>  |
| Kings   | low                              |              | -             | -         | 138           | 0.77          | 1             | 4.55      | 453           | 2.24          | 5                | 27.78     | 89            | 4.12         | 6             | 12.50      | 680           | 1.69           |
|   | moderate                         |              | 2             | 25.00     | 994           | 5.56          | -             | -         | 1,817         | 8.99          | 2                | 11.11     | 264           | 12.22        | 4             | 8.33       | 3,075         | 7.64           |
|   | middle                           |              | 2             | 25.00     | 3,008         | 16.83         | 7             | 31.82     | 4,952         | 24.49         | 4                | 22.22     | 562           | 26.01        | 13            | 27.08      | 8,522         | 21.17          |
|   | upper                            |              | 4             | 50.00     | 12,368        | 69.19         | 12            | 54.55     | 11,100        | 54.90         | 7                | 38.89     | 1,131         | 52.34        | 23            | 47.92      | 24,599        | 61.11          |
|   | zero & NAs                       |              | -             | -         | 1,367         | 7.65          | 2             | 9.09      | 1,895         | 9.37          | -                | -         | 115           | 5.32         | 2             | 4.17       | 3,377         | 8.39           |
|   | <b>23.4</b>                      | <b>total</b> |               | <b>8</b>  | <b>100.00</b> | <b>17,875</b> | <b>100.00</b> | <b>22</b> | <b>100.00</b> | <b>20,217</b> | <b>100.00</b>    | <b>18</b> | <b>100.00</b> | <b>2,161</b> | <b>100.00</b> | <b>48</b>  | <b>100.00</b> | <b>40,253</b>  |
| New York  | low                              |              | -             | -         | 21            | 0.15          | -             | -         | 43            | 0.55          | -                | -         | 10            | 1.91         | -             | -          | 74            | 0.32           |
|   | moderate                         |              | -             | -         | 294           | 2.03          | -             | -         | 215           | 2.76          | -                | -         | 44            | 8.40         | -             | -          | 553           | 2.43           |
|   | middle                           |              | -             | -         | 1,130         | 7.81          | 1             | 5.26      | 618           | 7.92          | 1                | 33.33     | 72            | 13.74        | 2             | 6.67       | 1,820         | 7.98           |
|   | upper                            |              | 8             | 100.00    | 12,477        | 86.18         | 16            | 84.21     | 6,178         | 79.21         | 2                | 66.67     | 381           | 72.71        | 26            | 86.67      | 19,036        | 83.49          |
|   | zero & NAs                       |              | -             | -         | 555           | 3.83          | 2             | 10.53     | 746           | 9.56          | -                | -         | 17            | 3.24         | 2             | 6.67       | 1,318         | 5.78           |
|   | <b>14.6</b>                      | <b>total</b> |               | <b>8</b>  | <b>100.00</b> | <b>14,477</b> | <b>100.00</b> | <b>19</b> | <b>100.00</b> | <b>7,800</b>  | <b>100.00</b>    | <b>3</b>  | <b>100.00</b> | <b>524</b>   | <b>100.00</b> | <b>30</b>  | <b>100.00</b> | <b>22,801</b>  |
| Queens  | low                              |              | 1             | 3.03      | 174           | 0.71          | 3             | 8.82      | 477           | 1.87          | -                | -         | 111           | 3.93         | 4             | 5.33       | 762           | 1.44           |
|   | moderate                         |              | 5             | 15.15     | 1,553         | 6.29          | 7             | 20.59     | 2,482         | 9.73          | 2                | 25.00     | 363           | 12.85        | 14            | 18.67      | 4,398         | 8.29           |
|   | middle                           |              | 6             | 18.18     | 4,832         | 19.58         | 5             | 14.71     | 6,715         | 26.31         | 2                | 25.00     | 795           | 28.15        | 13            | 17.33      | 12,342        | 23.28          |
|   | upper                            |              | 19            | 57.58     | 16,273        | 65.94         | 17            | 50.00     | 13,544        | 53.07         | 3                | 37.50     | 1,412         | 50.00        | 39            | 52.00      | 31,229        | 58.90          |
|   | zero & NAs                       |              | 2             | 6.06      | 1,847         | 7.48          | 2             | 5.88      | 2,301         | 9.02          | 1                | 12.50     | 143           | 5.06         | 5             | 6.67       | 4,291         | 8.09           |
|   | <b>36.6</b>                      | <b>total</b> |               | <b>33</b> | <b>100.00</b> | <b>24,679</b> | <b>100.00</b> | <b>34</b> | <b>100.00</b> | <b>25,519</b> | <b>100.00</b>    | <b>8</b>  | <b>100.00</b> | <b>2,824</b> | <b>100.00</b> | <b>75</b>  | <b>100.00</b> | <b>53,022</b>  |
| Westchester*  | low                              |              | -             | -         | 10            | 1.00          | -             | -         | 6             | 0.64          | -                | -         | 1             | 0.86         | -             | -          | 17            | 0.83           |
|   | moderate                         |              | 1             | 100.00    | 64            | 6.41          | -             | -         | 38            | 4.04          | -                | -         | 8             | 6.90         | 1             | 50.00      | 110           | 5.35           |
|   | middle                           |              | -             | -         | 125           | 12.53         | 1             | 100.00    | 126           | 13.39         | -                | -         | 14            | 12.07        | 1             | 50.00      | 265           | 12.90          |
|   | upper                            |              | -             | -         | 743           | 74.45         | -             | -         | 688           | 73.11         | -                | -         | 89            | 76.72        | -             | -          | 1,520         | 73.97          |
|   | zero & NAs                       |              | -             | -         | 56            | 5.61          | -             | -         | 83            | 8.82          | -                | -         | 4             | 3.45         | -             | -          | 143           | 6.96           |
|   | <b>1.0</b>                       | <b>total</b> |               | <b>1</b>  | <b>100.00</b> | <b>998</b>    | <b>100.00</b> | <b>1</b>  | <b>100.00</b> | <b>941</b>    | <b>100.00</b>    | <b>-</b>  | <b>-</b>      | <b>116</b>   | <b>100.00</b> | <b>2</b>   | <b>100.00</b> | <b>2,055</b>   |
| <b>A/A Total</b>                                      | low                              |              | 3             | 4.48      | 448           | 0.69          | 6             | 6.12      | 1,130         | 1.83          | 9                | 22.50     | 267           | 4.04         | 18            | 8.78       | 1,845         | 1.39           |
|   | moderate                         |              | 10            | 14.93     | 3,475         | 5.39          | 14            | 14.29     | 5,297         | 8.56          | 4                | 10.00     | 814           | 12.32        | 28            | 13.66      | 9,586         | 7.21           |
|   | middle                           |              | 13            | 19.40     | 10,507        | 16.29         | 19            | 19.39     | 14,338        | 23.18         | 10               | 25.00     | 1,722         | 26.07        | 42            | 20.49      | 26,567        | 19.98          |
|   | upper                            |              | 37            | 55.22     | 45,880        | 71.14         | 53            | 54.08     | 35,527        | 57.43         | 16               | 40.00     | 3,492         | 52.86        | 106           | 51.71      | 84,899        | 63.85          |
|   | zero & NAs                       |              | 4             | 5.97      | 4,187         | 6.49          | 6             | 6.12      | 5,570         | 9.00          | 1                | 2.50      | 311           | 4.71         | 11            | 5.37       | 10,068        | 7.57           |
|   | <b>100.0</b>                     | <b>total</b> |               | <b>67</b> | <b>100.00</b> | <b>64,497</b> | <b>100.00</b> | <b>98</b> | <b>100.00</b> | <b>61,862</b> | <b>100.00</b>    | <b>40</b> | <b>100.00</b> | <b>6,606</b> | <b>100.00</b> | <b>205</b> | <b>100.00</b> | <b>132,965</b> |

\* The bank takes only part of the county in its assessment area.

<sup>1</sup> Bank numbers include originated and purchased; Aggregate numbers include originated only; 1-4 family includes manufactured housing.

Sources of data: Bank (bank loans within assessment area); and HUD (borrower income levels).

| 1-4 FAMILY HMDA LOAN ORIGINATIONS <sup>1</sup>        |                       |              |               |               |               |            |               |                  |               |            |               |              |               |            |               |                |               |
|---|-----------------------|--------------|---------------|---------------|---------------|------------|---------------|------------------|---------------|------------|---------------|--------------|---------------|------------|---------------|----------------|---------------|
| YEAR 2005   |                       |              |               |               |               |            |               |                  |               |            |               |              |               |            |               |                |               |
| BORROWER INCOME LEVEL DISTRIBUTION -- NUMBER OF LOANS |                       |              |               |               |               |            |               |                  |               |            |               |              |               |            |               |                |               |
| County/Area   | Borrower Income Level | New Purchase |               | Refinancing   |               |            |               | Home Improvement |               |            |               | Total        |               |            |               |                |               |
|   |                       | Bank #       | Bank %        | Agg. #        | Agg. %        | Bank #     | Bank %        | Agg. #           | Agg. %        | Bank #     | Bank %        | Agg. #       | Agg. %        | Bank #     | Bank %        | Agg. #         | Agg. %        |
| Bronx   | low                   | 1            | 5.56          | 70            | 0.89          | -          | -             | 102              | 1.42          | 5          | 17.24         | 45           | 4.53          | 6          | 8.82          | 217            | 1.35          |
|   | moderate              | 4            | 22.22         | 626           | 7.94          | 4          | 19.05         | 573              | 8.00          | 9          | 31.03         | 135          | 13.60         | 17         | 25.00         | 1,334          | 8.32          |
|   | middle                | 2            | 11.11         | 1,156         | 14.67         | 5          | 23.81         | 1,703            | 23.78         | 6          | 20.69         | 261          | 26.28         | 13         | 19.12         | 3,120          | 19.46         |
|   | upper                 | 6            | 33.33         | 5,660         | 71.81         | 6          | 28.57         | 4,329            | 60.45         | 9          | 31.03         | 527          | 53.07         | 21         | 30.88         | 10,516         | 65.58         |
|   | zero & NAs            | 5            | 27.78         | 370           | 4.69          | 6          | 28.57         | 454              | 6.34          | -          | -             | 25           | 2.52          | 11         | 16.18         | 849            | 5.29          |
| <b>22.0</b>   | <b>total</b>          | <b>18</b>    | <b>100.00</b> | <b>7,882</b>  | <b>100.00</b> | <b>21</b>  | <b>100.00</b> | <b>7,161</b>     | <b>100.00</b> | <b>29</b>  | <b>100.00</b> | <b>993</b>   | <b>100.00</b> | <b>68</b>  | <b>100.00</b> | <b>16,036</b>  | <b>100.00</b> |
| Kings   | low                   | -            | -             | 97            | 0.47          | 1          | 4.17          | 248              | 1.28          | 3          | 7.69          | 90           | 3.88          | 4          | 4.40          | 435            | 1.02          |
|   | moderate              | 2            | 7.14          | 781           | 3.76          | 4          | 16.67         | 1,334            | 6.87          | 12         | 30.77         | 269          | 11.58         | 18         | 19.78         | 2,384          | 5.60          |
|   | middle                | 4            | 14.29         | 2,252         | 10.83         | 5          | 20.83         | 3,829            | 19.71         | 7          | 17.95         | 537          | 23.13         | 16         | 17.58         | 6,618          | 15.56         |
|   | upper                 | 19           | 67.86         | 16,419        | 78.96         | 10         | 41.67         | 12,225           | 62.92         | 17         | 43.59         | 1,325        | 57.06         | 46         | 50.55         | 29,969         | 70.44         |
|   | zero & NAs            | 3            | 10.71         | 1,245         | 5.99          | 4          | 16.67         | 1,793            | 9.23          | -          | -             | 101          | 4.35          | 7          | 7.69          | 3,139          | 7.38          |
| <b>29.4</b>   | <b>total</b>          | <b>28</b>    | <b>100.00</b> | <b>20,794</b> | <b>100.00</b> | <b>24</b>  | <b>100.00</b> | <b>19,429</b>    | <b>100.00</b> | <b>39</b>  | <b>100.00</b> | <b>2,322</b> | <b>100.00</b> | <b>91</b>  | <b>100.00</b> | <b>42,545</b>  | <b>100.00</b> |
| New York  | low                   | -            | -             | 7             | 0.05          | 1          | 11.11         | 31               | 0.51          | 4          | 44.44         | 16           | 2.30          | 5          | 21.74         | 54             | 0.27          |
|   | moderate              | -            | -             | 169           | 1.31          | -          | -             | 136              | 2.22          | 3          | 33.33         | 52           | 7.48          | 3          | 13.04         | 357            | 1.81          |
|   | middle                | -            | -             | 686           | 5.30          | 2          | 22.22         | 446              | 7.28          | 2          | 22.22         | 60           | 8.63          | 4          | 17.39         | 1,192          | 6.03          |
|   | upper                 | 5            | 100.00        | 11,543        | 89.18         | 5          | 55.56         | 5,004            | 81.64         | -          | -             | 546          | 78.56         | 10         | 43.48         | 17,093         | 86.47         |
|   | zero & NAs            | -            | -             | 538           | 4.16          | 1          | 11.11         | 512              | 8.35          | -          | -             | 21           | 3.02          | 1          | 4.35          | 1,071          | 5.42          |
| <b>7.4</b>  | <b>total</b>          | <b>5</b>     | <b>100.00</b> | <b>12,943</b> | <b>100.00</b> | <b>9</b>   | <b>100.00</b> | <b>6,129</b>     | <b>100.00</b> | <b>9</b>   | <b>100.00</b> | <b>695</b>   | <b>100.00</b> | <b>23</b>  | <b>100.00</b> | <b>19,767</b>  | <b>100.00</b> |
| Queens  | low                   | 1            | 2.44          | 116           | 0.40          | -          | -             | 261              | 1.08          | -          | -             | 100          | 3.09          | 1          | 0.79          | 477            | 0.85          |
|   | moderate              | 5            | 12.20         | 1,264         | 4.35          | 1          | 2.22          | 1,799            | 7.46          | 6          | 15.00         | 366          | 11.31         | 12         | 9.52          | 3,429          | 6.08          |
|   | middle                | 7            | 17.07         | 3,767         | 12.98         | 13         | 28.89         | 5,203            | 21.59         | 10         | 25.00         | 779          | 24.07         | 30         | 23.81         | 9,749          | 17.30         |
|   | upper                 | 20           | 48.78         | 22,385        | 77.11         | 22         | 48.89         | 14,977           | 62.15         | 23         | 57.50         | 1,849        | 57.12         | 65         | 51.59         | 39,211         | 69.56         |
|   | zero & NAs            | 8            | 19.51         | 1,498         | 5.16          | 9          | 20.00         | 1,860            | 7.72          | 1          | 2.50          | 143          | 4.42          | 18         | 14.29         | 3,501          | 6.21          |
| <b>40.8</b>   | <b>total</b>          | <b>41</b>    | <b>100.00</b> | <b>29,030</b> | <b>100.00</b> | <b>45</b>  | <b>100.00</b> | <b>24,100</b>    | <b>100.00</b> | <b>40</b>  | <b>100.00</b> | <b>3,237</b> | <b>100.00</b> | <b>126</b> | <b>100.00</b> | <b>56,367</b>  | <b>100.00</b> |
| Westchester*  | low                   | -            | -             | 7             | 0.72          | -          | -             | 4                | 0.49          | -          | -             | 3            | 2.44          | -          | -             | 14             | 0.73          |
|   | moderate              | -            | -             | 47            | 4.81          | -          | -             | 21               | 2.55          | -          | -             | 6            | 4.88          | -          | -             | 74             | 3.84          |
|   | middle                | -            | -             | 117           | 11.96         | -          | -             | 89               | 10.80         | -          | -             | 13           | 10.57         | -          | -             | 219            | 11.38         |
|   | upper                 | -            | -             | 759           | 77.61         | 1          | 100.00        | 642              | 77.91         | -          | -             | 98           | 79.67         | 1          | 100.00        | 1,499          | 77.87         |
|   | zero & NAs            | -            | -             | 48            | 4.91          | -          | -             | 68               | 8.25          | -          | -             | 3            | 2.44          | -          | -             | 119            | 6.18          |
| <b>0.3</b>  | <b>total</b>          | <b>-</b>     | <b>-</b>      | <b>978</b>    | <b>100.00</b> | <b>1</b>   | <b>100.00</b> | <b>824</b>       | <b>100.00</b> | <b>-</b>   | <b>-</b>      | <b>123</b>   | <b>100.00</b> | <b>1</b>   | <b>100.00</b> | <b>1,925</b>   | <b>100.00</b> |
| <b>A/A Total</b>                                      | low                   | 2            | 2.17          | 297           | 0.41          | 2          | 2.00          | 646              | 1.12          | 12         | 10.26         | 254          | 3.45          | 16         | 5.18          | 1,197          | 0.88          |
|   | moderate              | 11           | 11.96         | 2,887         | 4.03          | 9          | 9.00          | 3,863            | 6.70          | 30         | 25.64         | 828          | 11.23         | 50         | 16.18         | 7,578          | 5.55          |
|   | middle                | 13           | 14.13         | 7,978         | 11.14         | 25         | 25.00         | 11,270           | 19.55         | 25         | 21.37         | 1,650        | 22.39         | 63         | 20.39         | 20,898         | 15.29         |
|   | upper                 | 50           | 54.35         | 56,766        | 79.25         | 44         | 44.00         | 37,177           | 64.50         | 49         | 41.88         | 4,345        | 58.96         | 143        | 46.28         | 98,288         | 71.93         |
|   | zero & NAs            | 16           | 17.39         | 3,699         | 5.16          | 20         | 20.00         | 4,687            | 8.13          | 1          | 0.85          | 293          | 3.98          | 37         | 11.97         | 8,679          | 6.35          |
| <b>100.0</b>  | <b>total</b>          | <b>92</b>    | <b>100.00</b> | <b>71,627</b> | <b>100.00</b> | <b>100</b> | <b>100.00</b> | <b>57,643</b>    | <b>100.00</b> | <b>117</b> | <b>100.00</b> | <b>7,370</b> | <b>100.00</b> | <b>309</b> | <b>100.00</b> | <b>136,640</b> | <b>100.00</b> |

\* The bank takes only part of the county in its assessment area.

<sup>1</sup> Bank numbers include originated and purchased; Aggregate numbers include originated only; 1-4 family includes manufactured housing.

Sources of data: Bank (bank loans within assessment area); and HUD (borrower income levels).

| SMALL BUSINESS LENDING |                        |                                   |              |                |              |                |              |                  |              |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|------------------------|------------------------|-----------------------------------|--------------|----------------|--------------|----------------|--------------|------------------|--------------|--------------------------------------|-------------|-------------|-------------|------------|------------|--|-------------|----------------|-------------|---------------|-------------|------------------|
| YEAR 2004              |                        |                                   |              |                |              |                |              |                  |              |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
| County/Area            | Geography Income Level | Small Business Loans <sup>1</sup> |              |                |              |                |              |                  |              | % of Loans by Loan Size <sup>2</sup> |             |             |             |            |            | Loans to Small Businesses <sup>3</sup> |             |                |             |               |             |                  |
|                        |                        | Bank                              |              |                |              | Aggregate      |              |                  |              | Bank                                 |             |             | Aggregate   |            |            | Bank                                   |             |                |             | Aggregate     |             |                  |
|                        |                        | #                                 | %            | \$000's        | %            | #              | %            | \$000's          | %            | LS1                                  | LS2         | LS3         | LS1         | LS2        | LS3        | #                                      | %           | \$000's        | %           | #             | %           | \$000's          |
| Bronx                  | low                    | 38                                | 52.1         | 6,328          | 48.7         | 3,815          | 31.2         | 121,524          | 34.5         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | moderate               | 21                                | 28.8         | 3,398          | 26.1         | 3,563          | 29.2         | 102,884          | 29.2         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | middle                 | 11                                | 15.1         | 2,296          | 17.7         | 2,609          | 21.4         | 67,561           | 19.2         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | upper                  | 3                                 | 4.1          | 975            | 7.5          | 2,059          | 16.9         | 49,005           | 13.9         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | zero & NAs             | -                                 | -            | -              | -            | 171            | 1.4          | 11,102           | 3.2          |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | <b>9.3 total</b>       | <b>73</b>                         | <b>100.0</b> | <b>12,997</b>  | <b>100.0</b> | <b>12,217</b>  | <b>100.0</b> | <b>352,076</b>   | <b>100.0</b> | <b>58.9</b>                          | <b>12.3</b> | <b>28.8</b> | <b>96.1</b> | <b>1.9</b> | <b>2.0</b> | <b>46</b>                              | <b>63.0</b> | <b>9,390</b>   | <b>72.2</b> | <b>4,827</b>  | <b>39.5</b> | <b>157,655</b>   |
| Kings                  | low                    | 23                                | 9.7          | 1,827          | 5.6          | 4,544          | 10.9         | 139,011          | 12.9         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | moderate               | 100                               | 42.2         | 11,609         | 35.5         | 16,222         | 39.0         | 435,029          | 40.3         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | middle                 | 87                                | 36.7         | 15,488         | 47.3         | 13,156         | 31.6         | 314,517          | 29.1         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | upper                  | 25                                | 10.5         | 3,261          | 10.0         | 7,365          | 17.7         | 178,748          | 16.6         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | zero & NAs             | 2                                 | 0.8          | 550            | 1.7          | 285            | 0.7          | 11,891           | 1.1          |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | <b>30.2 total</b>      | <b>237</b>                        | <b>100.0</b> | <b>32,735</b>  | <b>100.0</b> | <b>41,572</b>  | <b>100.0</b> | <b>1,079,196</b> | <b>100.0</b> | <b>59.9</b>                          | <b>23.2</b> | <b>16.9</b> | <b>96.5</b> | <b>1.9</b> | <b>1.6</b> | <b>124</b>                             | <b>52.3</b> | <b>25,209</b>  | <b>77.0</b> | <b>16,324</b> | <b>39.3</b> | <b>467,070</b>   |
| New York               | low                    | 33                                | 11.2         | 1,021          | 1.3          | 3,494          | 4.3          | 96,843           | 3.1          |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | moderate               | 148                               | 50.3         | 56,713         | 72.1         | 5,169          | 6.4          | 183,429          | 5.9          |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | middle                 | 22                                | 7.5          | 3,230          | 4.1          | 6,028          | 7.5          | 228,803          | 7.3          |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | upper                  | 89                                | 30.3         | 17,615         | 22.4         | 64,449         | 80.0         | 2,522,409        | 81.0         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | zero & NAs             | 2                                 | 0.7          | 90             | 0.1          | 1,377          | 1.7          | 83,102           | 2.7          |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | <b>37.4 total</b>      | <b>294</b>                        | <b>100.0</b> | <b>78,669</b>  | <b>100.0</b> | <b>80,517</b>  | <b>100.0</b> | <b>3,114,586</b> | <b>100.0</b> | <b>48.0</b>                          | <b>8.2</b>  | <b>43.9</b> | <b>94.0</b> | <b>3.4</b> | <b>2.6</b> | <b>194</b>                             | <b>66.0</b> | <b>67,552</b>  | <b>85.9</b> | <b>31,910</b> | <b>39.6</b> | <b>1,130,142</b> |
| Queens                 | low                    | 2                                 | 1.1          | 310            | 0.9          | 455            | 1.1          | 19,994           | 1.7          |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | moderate               | 53                                | 29.8         | 8,324          | 24.8         | 10,036         | 24.5         | 320,575          | 27.1         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | middle                 | 100                               | 56.2         | 21,616         | 64.5         | 19,215         | 47.0         | 534,113          | 45.2         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | upper                  | 22                                | 12.4         | 3,221          | 9.6          | 10,783         | 26.4         | 280,138          | 23.7         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | zero & NAs             | 1                                 | 0.6          | 50             | 0.1          | 392            | 1.0          | 26,534           | 2.2          |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | <b>22.6 total</b>      | <b>178</b>                        | <b>100.0</b> | <b>33,521</b>  | <b>100.0</b> | <b>40,881</b>  | <b>100.0</b> | <b>1,181,354</b> | <b>100.0</b> | <b>51.7</b>                          | <b>21.9</b> | <b>26.4</b> | <b>95.9</b> | <b>2.3</b> | <b>1.8</b> | <b>123</b>                             | <b>69.1</b> | <b>29,042</b>  | <b>86.6</b> | <b>15,721</b> | <b>38.5</b> | <b>497,294</b>   |
| Westchester*           | low                    | -                                 | -            | -              | -            | -              | -            | -                | -            |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | moderate               | -                                 | -            | -              | -            | -              | -            | -                | -            |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | middle                 | 3                                 | 75.0         | 750            | 99.5         | 1,191          | 51.0         | 42,708           | 55.6         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | upper                  | 1                                 | 25.0         | 4              | 0.5          | 1,141          | 48.9         | 34,015           | 44.3         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | zero & NAs             | -                                 | -            | -              | -            | 2              | 0.1          | 50               | 0.1          |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | <b>0.5 total</b>       | <b>4</b>                          | <b>100.0</b> | <b>754</b>     | <b>100.0</b> | <b>2,334</b>   | <b>100.0</b> | <b>76,773</b>    | <b>100.0</b> | <b>75.0</b>                          | <b>-</b>    | <b>25.0</b> | <b>95.3</b> | <b>2.1</b> | <b>2.6</b> | <b>1</b>                               | <b>25.0</b> | <b>50</b>      | <b>6.6</b>  | <b>944</b>    | <b>40.4</b> | <b>25,700</b>    |
| <b>A/A Total</b>       | low                    | 96                                | 12.2         | 9,486          | 6.0          | 12,308         | 6.9          | 377,372          | 6.5          |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | moderate               | 322                               | 41.0         | 80,044         | 50.4         | 34,990         | 19.7         | 1,041,917        | 18.0         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | middle                 | 223                               | 28.4         | 43,380         | 27.3         | 42,199         | 23.8         | 1,187,702        | 20.5         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | upper                  | 140                               | 17.8         | 25,076         | 15.8         | 85,797         | 48.3         | 3,064,315        | 52.8         |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | zero & NAs             | 5                                 | 0.6          | 690            | 0.4          | 2,227          | 1.3          | 132,679          | 2.3          |                                      |             |             |             |            |            |  |             |                |             |               |             |                  |
|                        | <b>100.0 total</b>     | <b>786</b>                        | <b>100.0</b> | <b>158,676</b> | <b>100.0</b> | <b>177,521</b> | <b>100.0</b> | <b>5,803,985</b> | <b>100.0</b> | <b>53.6</b>                          | <b>16.2</b> | <b>30.3</b> | <b>95.2</b> | <b>2.7</b> | <b>2.2</b> | <b>488</b>                             | <b>62.1</b> | <b>131,243</b> | <b>82.7</b> | <b>69,726</b> | <b>39.3</b> | <b>2,277,861</b> |

\* The bank takes only part of the county in its assessment area.

<sup>1</sup> Bank's data includes originated or purchased; Aggregate's data includes originated only.

<sup>2</sup> Loan size categories: LS1 means up to \$100 thousand; LS2 means more than \$100 thousand and up to \$250 thousand; and LS3 means more than \$250 thousand.

<sup>3</sup> Loans included in "loans to small businesses" as defined in call report instructions, generally consisting of business loans to entities with gross annual revenues of \$1 million or less.

Sources of data: Bank (assessment area); FFIEC (aggregate lending); 2000 Census with 2004 tract definition (geography income levels)

| SMALL BUSINESS LENDING |                        |                                   |            |              |               |              |                |              |                  |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|------------------------|------------------------|-----------------------------------|------------|--------------|---------------|--------------|----------------|--------------|------------------|--------------------------------------|-------------|-------------|-------------|-------------|------------|--|------------|-------------|---------------|-------------|---------------|-------------|------------------|
| YEAR 2005              |                        |                                   |            |              |               |              |                |              |                  |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
| County/Area            | Geography Income Level | Small Business Loans <sup>1</sup> |            |              |               |              |                |              |                  | % of Loans by Loan Size <sup>2</sup> |             |             |             |             |            | Loans to Small Businesses <sup>3</sup> |            |             |               |             |               |             |                  |
|                        |                        | Bank                              |            |              |               | Aggregate    |                |              |                  | Bank                                 |             |             | Aggregate   |             |            | Bank                                   |            |             |               | Aggregate   |               |             |                  |
|                        |                        | #                                 | %          | \$000's      | %             | #            | %              | \$000's      | %                | LS1                                  | LS2         | LS3         | LS1         | LS2         | LS3        | #                                      | %          | \$000's     | %             | #           | %             | \$000's     | %                |
| Bronx                  | low                    | 40                                | 54.1       | 2,890        | 69.6          | 3,443        | 30.0           | 120,881      | 34.5             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | moderate               | 16                                | 21.6       | 547          | 13.2          | 3,414        | 29.7           | 97,681       | 27.9             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | middle                 | 10                                | 13.5       | 391          | 9.4           | 2,471        | 21.5           | 77,765       | 22.2             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | upper                  | 7                                 | 9.5        | 316          | 7.6           | 2,000        | 17.4           | 42,953       | 12.3             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | zero & NAs             | 1                                 | 1.4        | 10           | 0.2           | 155          | 1.3            | 10,700       | 3.1              |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | <b>13.1</b>            | <b>total</b>                      | <b>74</b>  | <b>100.0</b> | <b>4,154</b>  | <b>100.0</b> | <b>11,483</b>  | <b>100.0</b> | <b>349,980</b>   | <b>100.0</b>                         | <b>93.2</b> | <b>4.1</b>  | <b>2.7</b>  | <b>96.3</b> | <b>1.7</b> | <b>2.0</b>                             | <b>42</b>  | <b>56.8</b> | <b>1,088</b>  | <b>26.2</b> | <b>5,869</b>  | <b>51.1</b> | <b>163,795</b>   |
| Kings                  | low                    | 26                                | 13.1       | 3,060        | 13.3          | 4,393        | 10.7           | 134,239      | 12.0             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | moderate               | 80                                | 40.4       | 6,574        | 28.6          | 16,111       | 39.4           | 456,030      | 40.9             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | middle                 | 60                                | 30.3       | 8,584        | 37.3          | 13,088       | 32.0           | 330,754      | 29.7             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | upper                  | 28                                | 14.1       | 3,315        | 14.4          | 7,069        | 17.3           | 180,678      | 16.2             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | zero & NAs             | 4                                 | 2.0        | 1,475        | 6.4           | 206          | 0.5            | 12,369       | 1.1              |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | <b>35.0</b>            | <b>total</b>                      | <b>198</b> | <b>100.0</b> | <b>23,008</b> | <b>100.0</b> | <b>40,867</b>  | <b>100.0</b> | <b>1,114,070</b> | <b>100.0</b>                         | <b>74.7</b> | <b>12.1</b> | <b>13.1</b> | <b>96.7</b> | <b>1.7</b> | <b>1.6</b>                             | <b>91</b>  | <b>46.0</b> | <b>7,752</b>  | <b>33.7</b> | <b>21,298</b> | <b>52.1</b> | <b>518,168</b>   |
| New York               | low                    | 30                                | 19.9       | 1,577        | 7.9           | 3,271        | 4.6            | 96,589       | 3.3              |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | moderate               | 44                                | 29.1       | 3,553        | 17.8          | 4,887        | 6.9            | 149,782      | 5.1              |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | middle                 | 16                                | 10.6       | 3,115        | 15.6          | 5,595        | 7.9            | 206,991      | 7.0              |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | upper                  | 61                                | 40.4       | 11,690       | 58.6          | 56,143       | 79.3           | 2,422,022    | 82.2             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | zero & NAs             | -                                 | -          | -            | -             | 939          | 1.3            | 71,548       | 2.4              |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | <b>26.7</b>            | <b>total</b>                      | <b>151</b> | <b>100.0</b> | <b>19,935</b> | <b>100.0</b> | <b>70,835</b>  | <b>100.0</b> | <b>2,946,932</b> | <b>100.0</b>                         | <b>75.5</b> | <b>8.6</b>  | <b>15.9</b> | <b>93.6</b> | <b>3.5</b> | <b>2.8</b>                             | <b>94</b>  | <b>62.3</b> | <b>8,282</b>  | <b>41.5</b> | <b>34,808</b> | <b>49.1</b> | <b>1,050,475</b> |
| Queens                 | low                    | 1                                 | 0.7        | 25           | 0.1           | 440          | 1.0            | 16,270       | 1.3              |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | moderate               | 40                                | 28.6       | 2,363        | 6.4           | 10,855       | 25.2           | 314,506      | 24.4             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | middle                 | 78                                | 55.7       | 29,655       | 79.8          | 19,961       | 46.3           | 650,409      | 50.5             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | upper                  | 18                                | 12.9       | 5,036        | 13.6          | 11,457       | 26.6           | 280,667      | 21.8             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | zero & NAs             | 3                                 | 2.1        | 85           | 0.2           | 414          | 1.0            | 27,184       | 2.1              |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | <b>24.7</b>            | <b>total</b>                      | <b>140</b> | <b>100.0</b> | <b>37,164</b> | <b>100.0</b> | <b>43,127</b>  | <b>100.0</b> | <b>1,289,036</b> | <b>100.0</b>                         | <b>52.9</b> | <b>6.4</b>  | <b>40.7</b> | <b>96.3</b> | <b>1.8</b> | <b>1.9</b>                             | <b>108</b> | <b>77.1</b> | <b>32,209</b> | <b>86.7</b> | <b>21,222</b> | <b>49.2</b> | <b>631,186</b>   |
| Westchester*           | low                    | -                                 | -          | -            | -             | -            | -              | -            | -                |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | moderate               | -                                 | -          | -            | -             | -            | -              | -            | -                |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | middle                 | 1                                 | 33.3       | 600          | 80.0          | 1,138        | 49.3           | 40,379       | 51.0             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | upper                  | 2                                 | 66.7       | 150          | 20.0          | 1,169        | 50.7           | 38,809       | 49.0             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | zero & NAs             | -                                 | -          | -            | -             | -            | -              | -            | -                |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | <b>0.5</b>             | <b>total</b>                      | <b>3</b>   | <b>100.0</b> | <b>750</b>    | <b>100.0</b> | <b>2,307</b>   | <b>100.0</b> | <b>79,188</b>    | <b>100.0</b>                         | <b>66.7</b> | <b>-</b>    | <b>33.3</b> | <b>95.4</b> | <b>2.1</b> | <b>2.5</b>                             | <b>-</b>   | <b>-</b>    | <b>-</b>      | <b>-</b>    | <b>1,156</b>  | <b>50.1</b> | <b>31,802</b>    |
| <b>A/A Total</b>       | low                    | 97                                | 17.1       | 7,552        | 8.9           | 11,547       | 6.8            | 367,979      | 6.4              |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | moderate               | 180                               | 31.8       | 13,037       | 15.3          | 35,267       | 20.9           | 1,017,999    | 17.6             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | middle                 | 165                               | 29.2       | 42,345       | 49.8          | 42,253       | 25.1           | 1,306,298    | 22.6             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | upper                  | 116                               | 20.5       | 20,507       | 24.1          | 77,838       | 46.2           | 2,965,129    | 51.3             |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | zero & NAs             | 8                                 | 1.4        | 1,570        | 1.8           | 1,714        | 1.0            | 121,801      | 2.1              |                                      |             |             |             |             |            |  |            |             |               |             |               |             |                  |
|                        | <b>100.0</b>           | <b>total</b>                      | <b>566</b> | <b>100.0</b> | <b>85,011</b> | <b>100.0</b> | <b>168,619</b> | <b>100.0</b> | <b>5,779,206</b> | <b>100.0</b>                         | <b>71.9</b> | <b>8.7</b>  | <b>19.4</b> | <b>95.3</b> | <b>2.5</b> | <b>2.2</b>                             | <b>335</b> | <b>59.2</b> | <b>49,331</b> | <b>58.0</b> | <b>84,353</b> | <b>50.0</b> | <b>1,344,951</b> |

\* The bank takes only part of the county in its assessment area.

<sup>1</sup> Bank's data includes originated or purchased; Aggregate's data includes originated only.

<sup>2</sup> Loan size categories: LS1 means up to \$100 thousand; LS2 means more than \$100 thousand and up to \$250 thousand; and LS3 means more than \$250 thousand.

<sup>3</sup> Loans included in "loans to small businesses" as defined in call report instructions, generally consisting of business loans to entities with gross annual revenues of \$1 million or less.

Sources of data: Bank (assessment area); FFIEC (aggregate lending); 2000 Census with 2004 tract definition (geography income levels)

## GLOSSARY

### Aggregate

The cumulative lending by all HMDA-reporting lenders in the same geographic area under evaluation.

### Community Development

The term “community development” is defined to mean:

1. Affordable housing (including multifamily housing) for low- or moderate-income (“LMI”) individuals;
2. Community services targeted to LMI individuals;
3. Activities that promote economic development by financing business or farms that meet the size eligibility standards of the United States Small Business Administration (“SBA”) Development Company or Small Business Investment Company programs, or have gross annual incomes of \$1 million or less;
4. Activities that revitalize or stabilize LMI geographies; and
5. Activities that seek to prevent defaults and/or foreclosures in loans included in (1) and (3), above.

A “community development loan” is defined as a loan that has as its *primary purpose* community development. This includes but is not limited to loans to:

- Borrowers for affordable housing rehabilitation and construction, including construction and permanent financing for multifamily rental property serving low or moderate income (“LMI”) persons;
- Nonprofit organizations serving primarily LMI or other community development needs;
- Borrowers to construct or rehabilitate community facilities that are located in LMI areas or that primarily serve LMI individuals;
- Financial intermediaries including community development financial institutions, community development corporations, minority- and women-owned financial institutions, community loan funds or pools, micro-finance institutions, and low-income or community development credit unions that primarily lend or facilitate lending to promote community development;
- Local, state and tribal governments for community development activities; and
- Borrowers to finance environmental clean-up or redevelopment of an industrial site as part of an effort to revitalize the LMI community in which the property is located.

A “qualified investment” is defined as a lawful investment, deposit, membership share or grant that has as its *primary purpose* community development. This includes but is not limited to investments, deposits, membership shares or grants in or to:

- Financial intermediaries (including community development financial institutions, community development corporations, minority- and women-owned financial institutions, community loan funds, micro-finance institutions and low-income or community development credit unions) that primarily lend or facilitate lending in LMI areas or to LMI individuals in order to promote community development;
- Organizations engaged in affordable housing rehabilitation and construction;
- Organizations, including, for example, small business investment corporations that promote economic development by financing small businesses;
- Facilities that promote community development in LMI areas or LMI individuals, such as youth programs, homeless centers, soup kitchens, health care facilities, battered women’s centers, and alcohol and drug recovery centers;
- Projects eligible for low-income housing tax credits;
- State and municipal obligations, such as revenue bonds that specifically support affordable housing or other community development needs;
- Organizations serving LMI housing or other community development needs, such as counseling for credit, home ownership, home maintenance, and other financial services education; and
- Organizations supporting activities essential to the capacity of LMI individuals or geographies to utilize credit to sustain economic development, such as day care operations and job training programs that facilitate access to permanent jobs.

A “community development service” is defined as a service that has as its *primary purpose* community development, is related to the provision of financial services, and has not been considered in the evaluation of the banking institution's retail banking services. This includes but is not limited to:

- Providing technical assistance on financial matters to nonprofit, tribal or government organizations serving LMI housing or economic revitalization and development needs;
- Providing technical assistance on financial matters to small businesses or community development organizations;
- Lending employees to provide financial services for organizations facilitating affordable housing construction and rehabilitation or development of affordable housing;
- Providing credit counseling, home buyers and home maintenance counseling, financial planning or other financial services education to promote community development and affordable housing;
- Establishing school savings programs for LMI individuals;
- Providing seminars for LMI persons on banking and bank account record-keeping;
- Making ATM “Training Machines” available for extended periods at LMI community sites or at community facilities that serve LMI individuals; and
- Technical assistance activities to community development organizations such as:
  - ❖ Serving on a loan review committee;
  - ❖ Developing loan application and underwriting standards;
  - ❖ Developing loan processing systems;
  - ❖ Developing secondary market vehicles or programs;
  - ❖ Assisting in marketing financial services, including the development of

- ❖ advertising and promotions, publications, workshops and conferences;
- ❖ Furnishing financial services training for staff and management;
- ❖ Contributing accounting/bookkeeping services; and
- ❖ Assisting in fund raising, including soliciting or arranging investments.

### **Demand-Adjusted Penetration Rate**

The number of owner-occupied loans made by the institution (or aggregate as appropriate) in a geographic area per thousand owner-occupied housing units in that area. Mathematically, it is arrived at by dividing the number of owner-occupied housing units into the number of loans made and then multiplying by 1,000.

### **Demand-Adjusted Penetration Ratio**

A ratio that depicts geographic penetration of loans by comparing demand-adjusted lending in LMI areas with non-LMI areas. Mathematically, it is arrived at by dividing the demand-adjusted penetration rate in non-LMI areas into the demand-adjusted penetration rate in LMI areas and then expressed as a percentage.

A ratio of 100% means that the institution (or aggregate as appropriate) made an equal number of loans proportionally in LMI and non-LMI areas. Less than 100 percent would indicate less lending in LMI areas on the same basis compared to non-LMI areas, whereas over 100 percent would indicate a greater level of lending in LMI areas versus non-LMI areas.

### **Home Mortgage Disclosure Act (“HMDA”)**

The Home Mortgage Disclosure Act, enacted by Congress in 1975, and subsequently amended, requires institutions to annually report data about applications for residential (including multifamily) financing.

### **Loans to Small Businesses**

Small business loans to businesses with gross annual revenues of \$1 million or less.

### **Low or Moderate Income (“LMI”) Geographies**

Those census tracts or block numbering areas (“BNAs”), where according to the 1990 US Census, the median family income is less than 80% of the area median family income. In the case of tracted areas that are part of a Metropolitan Statistical Area (“MSA”) or Primary Metropolitan Statistical Area (“PMSA”), this would relate to the median family income for the MSA or PMSA in which the tracts are located. In the case of BNAs and tracted areas that are not part of a MSA or PMSA, the area median family income would be the statewide nonmetropolitan median family income.

### **LMI Borrowers**

Borrowers whose income, as reported on the loan application which the lender relied upon in making the credit decision, is less than 80% of the area median family income. In the case where the residential property is located in a MSA or PMSA, this would relate to the median family income for that MSA or PMSA. Otherwise, the area median family income would be the statewide nonmetropolitan median family income. In all instances, the area median family incomes used to measure borrower income levels are updated annually by the U.S. Department of Housing and Urban Development (“HUD”).

### **LMI Individuals/Persons**

Those individuals, whose income is less than 80% of the area median family income. In the case where the individual resides in a MSA or PMSA, this would relate to the median family income for that MSA or PMSA. Otherwise, the area median family income would be the statewide nonmetropolitan median family income. In all instances, the area median family incomes used to measure individual income levels are updated annually by HUD.

### **Small Business Loans**

Loans to businesses with original amounts of \$1 million or less.