



LARGE BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

Public Disclosure

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**Community Reinvestment Act
Performance Evaluation**

**Johnson Bank Arizona, National Association
Charter Number: 18684**

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Office of the Comptroller of the Currency

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

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Overall CRA Rating

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

The following table indicates the performance level of **Johnson Bank Arizona, National Association (JBAZ)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Johnson Bank Arizona, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The following factors support this rating.

- JBAZ’s lending volume reflects a good responsiveness to credit needs in its assessment area (AA) considering its size and significant competition.
- The bank originated an excellent level of community development loans that had a positive impact on the Lending Test rating.
- The geographic distribution of the home mortgage and small business loans is excellent.
- The borrower distribution of home mortgage and small business loans is adequate.
- Community development (CD) investments, including donations to local non-profit organizations, do an excellent job of supporting affordable housing programs and providing community services to low- and moderate-income (LMI) individuals.
- The bank’s branch delivery system, plus alternative delivery services are good and are accessible to geographies and individuals of different income levels. Services for small business clients have been enhanced with an innovative courier service, including a substantial portion of those in LMI census tracts (CTs).
- The CD services provided to affordable housing and other CD non-profit organizations by officers of the bank represent a significant investment of time and expertise. The bank provides a relatively high level of CD services.

Definitions and Common Abbreviations

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

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

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

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

Geography: A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

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

Home Mortgage Loans: Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by non-farm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by non-farm residential real estate as "small business loans" if the loans are reported on the TFR as non-mortgage, commercial loans.

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

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

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

Description of Institution

JBAZ is an intrastate bank headquartered in northern Phoenix, Arizona that serves Maricopa County as its AA. In addition to the main office, there are five branches, all in middle- and upper-income CTs. Two of these branches have opened since the last CRA examination. JBAZ had a staff of 79 employees as of December 31, 2002. Net earnings for the period ending December 31, 2002, were \$4.5 million on total assets of \$378 million. Earnings performance equaled a return on average assets (ROAA) of 1.29 percent. Tier one capital at year-end December 31, 2002, was \$29 million or 7.67 percent of total assets. Net loans totaled \$296 million or 78 percent of total assets.

JBAZ is a wholly owned subsidiary of Johnson Financial Group, Inc., (JFGI), formerly known as Johnson International, Inc., based in Racine, Wisconsin. Besides numerous banking subsidiaries located predominately in Wisconsin and Arizona, JFGI also controls insurance, investment, asset management, and commercial leasing entities. Additionally, JFGI controls a private bank in Switzerland and an offshore banking facility in the Grand Cayman Islands. At December 31, 2002, the holding company reported net income of \$13.8 million on total assets of \$2.6 billion.

The bank offers a full range of commercial and retail loans. A breakdown of loans as of December 31, 2002, reflects 69 percent in commercial, commercial real estate, and construction and development loans, and 27 percent in residential real estate loans. The bank's primary business strategy is to focus on customers with loan needs of \$500 thousand or more and/or deposits of \$200 thousand or more. This would include small to large sized family businesses and the high-end mortgage market. The bank also has a commitment to affordable housing, which it fulfills with a combination of lending, investments, and services.

Although it is a large bank for CRA purposes, JBAZ is a community bank with no offices outside Maricopa County. JBAZ is much smaller in relation to the many substantially larger competing banks in the AA both in terms of total asset size and number of branches. At June 30, 2003, three large banks (Bank One, N.A., Bank of America, N.A., and Wells Fargo Bank Arizona, N.A.) captured 70 percent of the deposit market share with over 350 branches in Maricopa County. No other bank had more than 4 percent of the deposit market share. JBAZ had 0.85 percent. Competition is high for both small business and residential mortgage lending in the area. According to 2002 peer lending data in Maricopa County, there were 771 mortgage lenders and 261 small business lenders. There are also numerous nation-wide credit card banks in the AA. Other than JBAZ's smaller size, there are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the Maricopa County AA.

The bank was rated Satisfactory at the last CRA examination performed as of June 4, 2001.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated JBAZ's CRA performance using the Large Bank tests in the revised CRA regulation. For the lending test, we considered loan originations beginning January 1, 2001 through December 31, 2002. The December 31, 2002, cut-off date is used because of the impact of the Census 2000 changes that were effective in 2003. Loans made through 2002 are compared to 1990 census demographics, while loans made in 2003 and forward will need to be measured against demographic comparators from the 2000 census. Using only one census demographic period for this evaluation provides a more consistent analysis. Market comparisons for HMDA and small business lending are also based on 2002 peer data.

We believe that an analysis of the 2001-2002 loan data from HMDA and CRA data collection reports is a fair representation of loans originated during the entire period. For CD loans, investments, and services, our evaluation period runs from the date of the last CRA examination, which is June 4, 2001, through the November 3, 2004, start date for this examination. We also considered smaller loans that did not meet the CD size definition, but that had clear CD purposes.

We did not include consumer loans or loans to farms in the analysis. Banks only report consumer loan data if they optionally elect to have them evaluated. The volume of JBAZ's consumer and farm loans was not significant.

We gave equal weight to home mortgage and small business loans in this evaluation. Although the percentages of dollars outstanding for commercial loans is over twice that of home mortgage loans as of December 31, 2002, the bank has a commitment to affordable housing. This is especially evident in home purchase loans, because a majority of the bank's HMDA lending consists of affordable housing loans for LMI individuals. Small business and home mortgage loans are also identified as needs in the bank's AA. The bank's own strategic focus is on size of borrowing need, not type of loan.

CD loans of \$1 million and larger were reviewed. We also considered smaller loans that did not meet the CD size definition, but which had clear CD purposes.

For the investment test, we evaluated investments and donations. For the service test, we evaluated retail services, including branch distribution and accessibility, and other CD services.

Data Integrity

We performed a data integrity examination in June 2004 by reviewing a sample of 2001-2002 HMDA and CRA data. We also reviewed the accuracy of the bank's CD loans, qualified investments, and CD services during the current CRA examination. We believe the data analyzed is an accurate representation of the bank's lending performance.

Selection of Areas for Full-Scope Review

The bank operates in only one AA. Our analysis consists of a full-scope review of this Maricopa County AA.

Ratings

The bank's rating is based on the full-scope review of the AA. To evaluate the overall record of performance, the OCC analyzed activities under the Lending, Investment, and Service Tests. The rating method is structured such that the Lending Test weighs most heavily among the three tests.

Other

We considered current information gathered from six local community groups associated with non-profit affordable housing, small business, and economic development organizations. Some of the organizations provide both affordable housing and small business services. The contacts indicated that CD needs in Maricopa County are similar to those throughout the country. These revolve around affordable housing, small businesses, and economic development needs.

Fair Lending Review

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions

The bank's performance under the lending test is rated **Outstanding**. Based on full-scope reviews, the bank's performance in Maricopa County is good.

Lending Activity

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity. Additional information is derived from 2002 peer small business data and the June 30, 2003 FDIC deposit market share database.

In this section of the performance evaluation, lending market share is measured by dollar volume of accounts as well as number of accounts. This is done to make loan and deposit information comparable since the deposit market share is calculated based on the dollar amount. Elsewhere in this document, market share refers to the number of transactions.

JBAZ's lending volume reflects a good responsiveness to credit needs in the AA considering its size and significant competition. During the evaluation period, JBAZ originated 124 reportable HMDA loans, 14 CD loans, and 469 small business loans in the AA. These are all significant increases over originations at the last examination. Lending activity is measured both by lending market share rank among peer lenders, and in comparison to the bank's own deposit market share percent.

- Home mortgage loans. By rank compared to peers, JBAZ is a small lender of overall home mortgage products in Maricopa County. However, the bank has an emphasis on home purchase loans in the affordable housing market, which fulfills an important credit need in the community. Based on 2002 Peer Mortgage Data in the western region, JBAZ ranked 221st by dollar amount with only a 0.03 percent market share. Compared to the bank's deposit market share of 0.85 percent, it is clear that there are more out-of-territory lenders in the market place than deposit taking institutions, which increases the competition for home mortgage loans.
- Small business loans. JBAZ ranked 18th by number of loans with only a 0.34 percent market share, but 7th by dollar amount of small business loans, with a 2.98 percent market share. This is a very respectable rank considering the relatively small size of the bank and the nature of the higher-ranking competition that included three nation-wide banks and other larger regional banks. It is a very competitive market. One bank alone had 22 percent of the dollar amount of the loans in the AA, and none of the other 260 banks had over 10 percent.
- Loan size. The average business loan size for the bank, at \$232 thousand, is higher than the overall peer average business loan of \$26 thousand. As previously noted, the bank competes with several credit card lenders in the AA, which significantly lowers the average loan size.

- Community development loans. The volume of qualifying CD loans is excellent. The bank originated 14 loans during the evaluation period totaling \$10.5 million. This doubles the number of CD loans over the last CRA examination and represents 36 percent of Tier 1 Capital. The loans met recognized CD needs inside the AA for affordable housing, including two multi-family loans, and for economic development.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2 and 4 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. Table 2 is for home purchase loans; table 4 is for home mortgage refinance loans. The bank is involved in both types of lending. Other home mortgage loan tables were omitted because the bank reported no loans for home improvement (table 3), or multi-family loans (table 5).

With 90 home purchase and 34 home refinance loans, the bank has a 0.03 and 0.01 percent of the overall market share, respectively. While the volume of loans in the overall market place is small, the bank exceeded their market share demographics. The 2002 market share by geography shows that JBAZ's lending market share in low- (.06) and moderate-income geographies (.05) exceeds the overall market share of .03. This shows that within the context of the competitive banking environment, JBAZ was able to improve their overall market share in penetration of LMI geographies. Consequently, the geographic distribution of home mortgage loans is excellent.

Geographic distribution performance is measured against the demographic of percentage of owner occupied units in low-, moderate-, middle-, and upper-income geographies. This demographic represents the opportunity for the bank to lend in a given geography. The bank's loan activity in low-income geographies significantly exceeds the demographic for home purchase and refinance loans. The activity in moderate-income geographies also significantly exceeds the demographic for home purchase loans. While it is far below the demographic for home mortgage refinance loans in moderate-income geographies, performance for low-income geographies exceeds the demographics.

Small Loans to Businesses

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses. The bank does not make small loans to farms, so Table 7 in appendix C was omitted.

The bank's primary lending focus for this evaluation period is small loans to businesses. Small loans are defined as those of less than or equal to \$1 million. As with home mortgage loans, the bank's 0.34 percent market share with 469 loan originations is small, due to the significant number of small business lenders in the AA.

The geographic distribution of small loans to business is excellent. This performance is measured against the demographic percentage of businesses in low-, moderate-, middle- and upper-income geographies. This demographic represents the opportunity for the bank to make small business loans in a given geography. The bank's small business loan activity in LMI CTs is excellent. It significantly exceeds the demographic in low-income CTs and slightly exceeds the demographic in moderate-income CTs.

Lending Gap Analysis

We did not identify any unexplained conspicuous gaps in the bank's lending activity.

Inside/Outside Ratio

The bank's inside/outside ratio is excellent. We calculated the inside/outside ratio at the bank level. JBAZ originated a majority of home mortgage and small business loans in the AA. The bank originated 93 percent of home mortgage and 95 percent of small business loans inside the AA. This factors positively into the overall analysis of the geographic distribution of lending by income level of geography.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8 and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. Table 8 is for home purchase loans; table 10 is for home mortgage refinance loans. The bank was involved in both types of lending. The other home mortgage loan table (table 9) was omitted because the bank reported no loans for home improvement.

The bank has 0.03 percent of the overall market share for home purchase loans, and 0.01 percent of the overall market share for home mortgage refinance loans. However, the borrower distribution of these loans is good. Performance is measured against the demographic of the percentage of families in the AA who are low-, moderate-, middle-, and upper-income. This demographic represents the opportunity for the bank to lend to borrowers of each income level. The bank's loan activity to low-income borrowers significantly exceeds the demographic for home purchase loans and slightly exceeds in moderate-income geographies. The bank loan activity to LMI borrowers is non-existent for home mortgage refinance loans.

As noted under the geographic distribution analysis, the bank's focus on affordable housing is on home purchase loans. Fifty-one percent of the bank's home purchase loans were to LMI borrowers. Because there is more demand for affordable housing purchase lending than refinancing, as evidenced by the higher number of applications for home purchase loans, and the nominal number of home refinance loans that were denied or withdrawn, we weighed the home purchase lending higher, and rated the borrower distribution for home mortgage loans as good overall.

Good performance in home mortgage financing is further supported because 10 percent of the households in the bank's AA are below the poverty level, which also influences the ability to

own a home. These families generally rent because they cannot afford to purchase a house. Housing costs in the AA are high compared to the MFI. According to the 2002 multiple listing service, the average median-price for sale of a single-family home in Phoenix was \$132 thousand. The 2002 HUD adjusted MFI for the AA was \$57,900. Based on an industry rule of thumb that an individual can afford a house that costs up to 2.5 times their annual gross income, it appears that the MFI of \$57,900 can support a house costing \$145 thousand. However, low-income families earn 50 percent or less of the MFI, or less than \$29 thousand. This income level can only support a house costing \$72 thousand. Moderate-income families earn less than 80 percent of the MFI, or approximately \$46 thousand. This income level can only support a house costing approximately \$116 thousand. The cost of housing is a significant barrier to obtaining mortgage financing.

Small Loans to Businesses

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses. The bank does not make small loans to farms, so Table 12 is omitted.

As stated earlier, the bank's primary lending focus for this evaluation period is business loans. Our analysis is focused on the comparison of the bank's lending to businesses with revenues of \$1 million or less to the demographics of the AA.

Borrower distribution of loans to small businesses is adequate. The bank made approximately 24 percent of its small business loans to businesses with revenues of \$1 million or less. This is significantly below the demographics. However, it is important to remember that the bank's market niche strategy targets business customers who have loan needs of \$500 thousand or more and/or deposits of \$200 thousand or more. These tend to be larger businesses with revenues of over \$1 million. The bank's 0.34 percent overall market share is small, due to the number of business lenders in the AA. However, the bank's own market share of small business loans to businesses with annual revenues of \$1 million or less is good. At 0.41 percent, it exceeds the bank's overall market share. Of those loans, over 70 percent are small loans of less than \$250 thousand, and 49 percent are very small loans of \$100 thousand or less, reflecting the bank's efforts to meet the need for smaller loans to businesses in the AA.

During the evaluation period, JBAZ also originated 11 other loans totaling \$2.5 million that are secured by residential real estate, but were made for small business purposes. These loans are in amounts of \$870 thousand or less. Because a bank cannot report loans secured by residential real estate as small business loans, JBAZ may, at its option, collect and maintain the loan data for consideration in CRA performance. These additional loans, while not included in the volume or market share information for comparative purposes, show further efforts the bank is making in helping to meet the small business credit needs of its assessment area. These loans are reported in Table 1, Other Products, in appendix C.

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multi-family loans that also qualify as CD loans.

The bank has a high level of CD loans, which demonstrates excellent responsiveness to the needs of the AA and has a positive impact on the lending test rating. During the review period from June 4, 2001 to November 8, 2004, the bank originated 14 CD loans totaling \$10.5 million. This represents 36 percent of Tier 1 Capital. The loans helped provide affordable housing, or economic development. JBAZ's CD loans include some of the following.

- Multiple loans to three different non-profit organizations supporting over 180 units for LMI senior housing, including accessible housing for LMI seniors, for over \$4 million.
- Three SBA 504 loans, a program that is a long-term financing tool for economic development within a community, for over \$4.5 million. Criteria for the SBA 504 loan program include meeting the job creation criteria or a CD goal. For the job creation goal, generally, a business must create or retain one job for every \$50,000 provided by the SBA.
- Two multi-family rehabilitation loans supporting 78 units for LMI individuals in LMI CTs, for over \$1.2 million.

We also considered smaller loans that did not meet the CD size definition, but that had clear CD purposes.

Product Innovation and Flexibility

Loans to two of the non-profit organizations for LMI housing were considered innovative and complex because they were done using a combination of organizations and financing techniques, including FNMA, grants from the FHLB affordable housing program, a municipal land grant, low-income housing tax credits (LIHTC), the Arizona Department of Housing, and a state housing trust fund.

INVESTMENT TEST

Conclusions

The bank's performance under the investment test is rated **Outstanding**. Based on full-scope reviews, the bank's performance in Maricopa County is excellent.

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

During the current review period, the bank had over \$2.8 million in qualified CD investments and donations, representing 9.7 percent of Tier 1 Capital, and \$311 thousand in prior period investments.

- The majority of the dollars, \$2.4 million, were in current period FHLMC or FNMA CRA investment loan pools inside the AA.
- There was another \$238 thousand in the pools that served the broader statewide area outside of Maricopa County. That portion does not appear on table 14.

- Other current period investments include deposits in a minority owned Federal Credit Union; investment in a local non-profit housing authority's pool, funding below market 2nd mortgages and related closing costs for 1st time homebuyers with below market rates; and an equity equivalent investment in a local economic development company that provides loans to new and existing companies in a targeted redevelopment area.
- In addition, the bank donated \$72 thousand to 12 qualifying CD organizations. Although the dollars are comparatively smaller than the investment pools, according to community contacts, these contributions represent the lifeblood of local non-profit organizations. Six were affordable housing organizations, and the other six provide all or a majority of the services to LMI individuals. We gave the greatest weight to those contributions where the clients served were all LMI.

SERVICE TEST

Conclusions

The bank's performance under the Service Test is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in Maricopa County is good.

Retail Banking Services

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

In the discussion below, we will show that JBAZ's branch delivery system is accessible to geographies and individuals of different income levels in the Maricopa County AA area. In addition, the bank provided an excellent level of CD services that benefited the AA. Branch distribution, supplemented by an innovative alternative delivery system, received the most weight in rating the bank's performance under the service test.

With only six branches, JBAZ cannot provide the level of convenience and accessibility that a nation-wide organization can. The JBAZ offices are clustered in the northeastern part of the 9,226 square mile county, but there is also a significant dispersion of LMI CTs in the northeast part of the AA. Therefore, although JBAZ does not have any branches in LMI CTs, one of the branches opened since the last examination is adjacent or accessible to approximately 35 moderate-income CTs, and 23 low-income CTs. That represents about 32 percent of the AA's moderate-income CTs. However, a full 85 percent of the AA's low-income CTs are immediately south of the bank's Central and Palm branch.

Branch access is also not critical for the bank's affordable housing activity for LMI individuals. The clients are referred to the bank by a local non-profit affordable housing entity that has provided the applicant with extensive pre-homeownership training. The bank underwrites the loan, but the loans are closed at the title company of the client's choice, so many of them never have to come to a bank office for this service.

Also, as noted previously, JBAZ is primarily a business bank. To make their services accessible to businesses in LMI CTs, JBAZ provides a courier service to their business clients.

According to their client list at examination date, 21 (or 12 percent) of the businesses signed up for this service are in low-income CTs and 64 (or 36 percent) are in moderate-income CTs. This compares very favorably to the respective 5 and 20 percent of businesses in LMI geographies previously discussed from Table 6. Pick-up requests range from daily, to once a week or “when called.”

Community Development Services

JBAZ’s level of CD services in the Maricopa County AA is excellent.

The bank provided over 1,400 hours of loaned executive service to qualifying CD organizations. These services were provided by 12 different officers of the bank in various ways that qualified as technical assistance, including some of the following.

- Over the last four years, three different officers served as board members, and four other officers assisted in audits and loan review for a local minority-owned Federal Credit Union.
- Over the last four years, three different officers served on loan review committees and provided fundraising assistance for two local affordable housing organizations.
- At various times during the last four years, different officers have provided fund raising assistance to three local non-profit organizations that provide services to LMI individuals.
- Two officers have provided technical assistance in obtaining financing for two different affordable housing associations and various other non-profit organizations through federal, state, and county agencies and tax credits, and with grant applications.

As with donations, some of the organizations providing services to LMI individuals also provide services to the community at large. These were given less weight in our analysis.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/01 to 12/31/02) Investment and Service Tests and CD Loans: (06/04/01 to 11/08/04)	
Financial Institution	Products Reviewed	
Johnson Bank Arizona, N.A. (JBAZ) Phoenix, AZ	HMDA Small Business CD Loans Qualified Investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Maricopa County portion of the Phoenix MSA #4600	Full-Scope	

Appendix B: Market Profiles for Full-Scope Areas

Maricopa County portion of the Phoenix MSA #4600

Demographic Information for Full-Scope Area: Maricopa County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	466	5.79	23.18	38.20	31.97	0.86
Population by Geography	2,122,101	4.46	24.61	40.33	30.43	0.17
Owner-Occupied Housing by Geography	511,344	2.13	18.83	43.14	35.89	0.00
Businesses by Geography	168,787	4.82	19.96	36.47	38.17	0.58
Farms by Geography	2,981	2.58	17.58	44.45	35.36	0.03
Family Distribution by Income Level	552,909	19.01	18.06	23.20	39.74	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	204,950	7.60	36.30	40.77	15.33	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$35,425 = \$57,900 =10%	Median Housing Value Unemployment Rate (BLS 2002)			= \$83,694 = 5.7%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 2002 HUD updated MFI.

JBAZ operates in a single AA consisting of the Maricopa County portion of the Phoenix MSA. The JBAZ AA excludes the portion of the Phoenix MSA that consists of the 24 CTs of Pinal County south of Maricopa County, between Phoenix and Tucson. This meets the legal requirements of CRA.

Maricopa County is one of the largest in the country, stretching 100 miles in diameter and covering a total of 9,226 square miles. Phoenix and several smaller towns and cities including Apache Junction, Avondale, Buckeye, Carefree, Cave Creek, Chandler, Deer Valley, Fountain Hills, Gila Bend, Gilbert, Glendale, Goodyear, Guadalupe, Litchfield Park, Mesa, Paradise Valley, Peoria, Scottsdale, St. Johns, Sun City, Surprise, Tempe, Tolleson, Wickenburg, and Youngstown all lie within Maricopa County. Luke Air Force Base and the Indian Reservations of Fort McDowell, Salt River and Gila River are also within the boundaries of the county. As of the 1990 census the population was 2 million. In 2000, the estimated population had grown to over 3 million.

Based on the 1990 census, which is the database used for this analysis, there are 466 CTs in Maricopa County. Those CT's include 149 upper-, 178 middle-, 108 moderate-, and 27 low-income tracts. There are also 4 "NA" tracts, usually consisting of prisons, universities, etc., for which there is no reported income by the population to allow a designation of low- to upper-income.

JBAZ faces competition from numerous other financial institutions.

- The June 30, 2003 FDIC Deposit Market Share report lists 60 financial institutions in Maricopa County competing for \$39 billion worth of deposits. Three nation-wide institutions capture 70 percent of the deposits among them: Bank One, Bank of America, and Wells Fargo. No other institution has more than 4 percent of the deposit market share. Ranked 15th on the list, JBAZ has only 0.85 percent.
- The 2002 peer lender market share report for small business data lists 261 financial institutions making over \$2 billion in small business loans in Maricopa County. Ranked 18th by number of loans and 7th by dollar amount of loans, JBAZ has a 0.34 percent market share by number and 2.98 percent market share by dollar amount of business loans.
- The 2002 peer lender market share report for all HMDA loans lists 771 financial institutions making over \$56 billion in home mortgage loans in Maricopa County. Ranked 262nd by number of loans and 221st by dollar amount of loans, JBAZ has a 0.01 percent market share by number and a 0.03 percent market share by dollar amount of home mortgage loans.
- The same top three nation-wide institutions that have 70 percent of the deposits also have over 350 branches in Maricopa County. By comparison, JBAZ has its main office and five branches.

The unemployment rate for the Phoenix-Mesa MSA has been increasing over the last 3 years, from 2.7 percent in 2000 to 4.0 percent in 2001 and 5.7 percent in 2002. According to The Business Journal of June 2002, the top 10 employers in the greater Phoenix area were the State of Arizona, Wal-Mart Stores, Maricopa County, Banner Health Systems, Honeywell International, Krogers, the City of Phoenix, the USPS, Motorola, and Intel. Major industries include high technology and tourism.

To help us understand more about the bank's performance context, we considered information gathered from six community contacts. The community contacts identified affordable housing, small business, and economic development loans as the primary community credit needs. Overall, the contacts described community banks in the area as doing a satisfactory job of meeting area credit needs. In the affordable housing arena, there was some concern expressed about decreasing participation by large banks by one contact, but satisfaction by another housing organization. Both listed various smaller local banks, including JBAZ, as doing a good job. For small business lending, there is a continued desire for banks to make smaller dollar loans for newer businesses, or provide funding to non-profit organizations that engage in micro-lending programs. In affordable housing and small business contacts, frustration was expressed that banks are reluctant or slow to deal with any new products, different industries, or funding concepts that they do not have experience with. Concern was also expressed that funding for community organizations is drying up.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's AA. See Interagency Q&As __. 12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MSA/AA column and record the corresponding numbers and amounts in the "Qualified Investments" column.

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

Institution ID: JOHNSON BANK ARIZONA NA

Table 1. Lending Volume

LENDING VOLUME		Geography: ARIZONA						Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
MSA/Assessment Area (2002):	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Maricopa County	100.00	124	29,545	469	102,925	0	0	14	10,523	607	142,993	100.00

* Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MSA rating area.

** The evaluation period for Community Development Loans is from June 04, 2001 to November 08, 2004.

*** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MSA, or institution, as appropriate.

Institution ID: JOHNSON BANK ARIZONA NA

Table 1. Other Products

LENDING VOLUME		Geography: ARIZONA		Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002	
MA/Assessment Area:	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
Full Review:					
Maricopa County			11	2,561	

(*)The evaluation period for Optional Product Line(s) is from June 4, 2001 to November 8, 2004.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: ARIZONA								Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Maricopa County	90	100.00	2.13	13.33	18.83	24.44	43.14	21.11	35.89	41.11	0.03	0.06	0.05	0.01	0.04

* Based on 2002 Peer Mortgage Data (WE1)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: ARIZONA								Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Maricopa County	34	100.00	2.13	5.88	18.83	2.94	43.14	20.59	35.89	70.59	0.01	0.00	0.00	0.00	0.01

* Based on 2002 Peer Mortgage Data (WE1)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: ARIZONA								Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					
MSA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Maricopa County	469	100.40	4.84	18.63	20.07	21.84	36.69	28.91	38.40	30.62	0.34	1.25	0.43	0.29	0.30

* Based on 2002 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: ARIZONA						Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002						
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Maricopa County	90	100.00	19.01	27.38	18.06	23.81	23.20	8.33	39.74	40.48	0.03	0.07	0.02	0.01	0.04

* Based on 2002 Peer Mortgage Data (WE1)

** As a percentage of loans with borrower income information available. No information was available for 6.7% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: ARIZONA						Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002						
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
Full Review:															
Maricopa County	34	100.00	19.01	0.00	18.06	0.00	23.20	8.33	39.74	91.67	0.01	0.00	0.00	0.00	0.01

* Based on 2002 Peer Mortgage Data (WE1)

** As a percentage of loans with borrower income information available. No information was available for 29.4% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: ARIZONA		Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
MSA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Maricopa County	469	100.00	67.96	23.67	49.04	22.39	28.57	0.34	0.41

* Based on 2002 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 11.73% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ARIZONA				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002			
MSA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Maricopa County	4	311	19	2,817	23	3,128	100%	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: ARIZONA				Evaluation Period: JUNE 4, 2001 TO NOVEMBER 08, 2004									
MSA/Assessment Area:	Deposits	Branches				Branch Openings/Closings				Population							
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Maricopa County	100.00	6	100.00	0.00	0.00	33.00	67.00	2	0	0	0	0	+2	4.46	24.61	40.33	30.43

* 0.17% of the population resides in geographies that have not been assigned an income classification.