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Comptroller of the Currency Administrator of National Banks

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# **Public Disclosure**

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# Community Reinvestment Act Performance Evaluation

Metrobank, National Association Charter Number: 23175

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

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## **General Information**

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

This document is an evaluation of the CRA performance of Metrobank, N.A. prepared by the Office of the Comptroller of the Currency (OCC), the institution's supervisory agency, as of March 19, 2001. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

#### **Definitions and Common Abbreviations**

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

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

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

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

**Community Development (CD)** - Affordable housing for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 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.

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

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

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

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

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

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

**Median Family Income (MFI)** - The median income determined by the United States 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 United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

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

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

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

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

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

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

## **Overall CRA Rating**

Institution's CRA Rating: This institution is rated "Satisfactory."

The following table indicates the performance level of Metrobank, N.A. with respect to the Lending, Investment, and Service Tests:

		Metrobank, N.A. erformance Tests	
Performance Levels	Lending Test*	Investment Test	Service Test
Outstanding		Х	
High Satisfactory	Х		Х
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- Metrobank's lending to borrowers of different income levels is good in the Davenport-Moline-Rock Island MSA.
- The geographic distribution of Metrobank's HMDA and small business lending shows an adequate record of lending in low- and moderate-income geographies in the assessment area (AA).
- Product innovation and flexibility had a positive impact on the lending test conclusions for the MSA
- Metrobank made an excellent level of qualified investments in the MSA.
- Metrobank provides a relatively high level of community development services within the AA.

#### **Description of Institution**

Metrobank, N.A. (Metrobank) is an interstate institution headquartered in Davenport, Iowa. Metrobank serves the Quad City area, which includes the cities of Bettendorf and Davenport, Iowa and Moline and Rock Island, Illinois. Other major cities located in the MSA are East Moline, Silvas, and Milan, Illinois. See the Market Profile in Appendix B for additional details.

Metrobank operates ten offices within the assessment area, which consists of Rock Island and Henry Counties in Illinois and Scott County in Iowa. Eight of these offices are in Rock Island County, Illinois and two are in Scott County, Iowa. There are no branches located within Henry County. Seven of the eight Illinois branches are located far east of Interstate 74, which provides a significant physical barrier to the bank. Metrobank also has 32 deposit taking ATMs, 24 in Illinois and eight in Iowa.

Metrobank is owned by Metrocorp Incorporated, a one-bank holding company located in East Moline, Illinois. As of December 31, 2000 Metrocorp Incorporated had total assets of \$425 million. Metrobank has no other affiliates.

Metrobank had \$425 million in total assets, \$152 million in total loans, and \$31 million in Tier I capital on December 31, 2000. A significant portion of the loan portfolio is real estate secured. Almost 31 percent of the portfolio is 1-4 family residential loans, 15 percent is commercial real estate loans, 3 percent is construction and land development loans, and 1 percent is multifamily loans. The remainder of the portfolio is mostly consumer loans (45 percent), with minimal commercial lending (5 percent) and very few municipal loans (less than 1 percent).

There are no financial, legal or other factors, which impede the bank's ability to meet the credit needs in its assessment area (AA).

## **Evaluation Period/Products Evaluated**

We reviewed home mortgage and small business loans for the time period of January 1, 1999 to December 31, 2000. Community development loans were reviewed from November 2, 1998 through March 19, 2001. Metrobank's last CRA evaluation dated November 2, 1998 rated the bank "Satisfactory."

Our review of investments included an analysis of the investment portfolio and the donations and grants made between November 2, 1998 and March 19, 2001. We considered investments and donations or grants to organizations that have community development as their primary purpose.

Our evaluation of bank services included analyzing the bank's branch and ATM network for the availability and effectiveness of delivering retail-banking services. We analyzed the effect of changes in branch locations since our previous CRA examination. We also considered the extent and innovativeness of the bank's community development services in meeting the credit needs of its AA.

## **Data Integrity**

We verified a sample of HMDA and small business loans to determine the accuracy of data presented by the bank. We reviewed the sample of HMDA-reportable transactions to ensure the purpose, action taken, location, race, gender, applicant income, and loan size were accurately included on Metrobank's Loan Application Register. We reviewed the sample of small business loans to ensure the loan type, original amount, location, and gross revenue were accurately reported. We noted significant errors in key fields of HMDA and small business data during our review. Metrobank management performed a file search for all small business and HMDA loans reported during 1999 and 2000 and corrected all errors noted. Our follow-up review of HMDA and small business loans noted only minor clerical errors. This performance evaluation is based on accurate data following Metrobank's file search.

We also reviewed the bank's community development activities. We analyzed loans, investments, and donations made and services provided from November 2, 1998 through March 19, 2001. The bank submitted several loans, investments, donations, and services for our review that did not meet the definition of community development. We determined which loans, investments, organizations, and services met the definition of community development and included those under the Lending, Investment or Service Test, respectively.

## Selection of Areas for Full-Scope Review

Our analysis included full-scope examination procedures for Metrobank's only AA. Metrobank has offices in both Illinois and Iowa within the Davenport-Moline-Rock Island multi-state MSA.

## Ratings

Metrobank's overall rating is the same as the multi-state MSA rating since the bank operates in only this one AA. The multi-state MSA rating is based on conclusions reached during our full-scope review of this AA.

When determining conclusions for the Lending Test, home mortgage products were weighted more heavily than small loans to businesses, as mortgage lending represents a larger portion of Metrobank's loan portfolio and is a stronger focus of its business strategy.

## Other

We conducted two community contact interviews during our evaluation. We contacted one organization in each state of the Davenport-Moline-Rock Island MSA. The contacts included one community development organization and one affordable housing organization. The contacts indicated the major credit needs are affordable housing and small business lending.

## **Fair Lending Review**

An analysis of two years of HMDA, small business and small farm lending data, public comments, and consumer complaint information was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The last comprehensive fair lending examination conducted by the OCC was on November 2, 1998. At that time, we did not find any evidence of noncompliance with fair lending laws or regulations.

## **Multistate Metropolitan Area Rating**

CRA Rating for Davenport-Moline-Rock Island, Iowa-Illinois MSA: SatisfactoryThe Lending Test is rated:High-SatisfactoryThe Investment Test is rated:OutstandingThe Service Test is rated:High-Satisfactory

The major factors that support this rating include:

- Metrobank's lending to borrowers of different income levels is good in the Davenport-Moline-Rock Island MSA.
- The geographic distribution of Metrobank's HMDA and small business lending shows an adequate record of lending in low- and moderate-income geographies in the assessment area (AA).
- Product innovation and flexibility had a positive impact on the lending test conclusions for the MSA
- Metrobank made an excellent level of qualified investments in the MSA.
- Metrobank provides a relatively high level of community development services within the AA.

#### Description of Institution's Operations in Davenport-Moline-Rock Island MSA

Metrobank performs the vast majority of its operations in the state of Illinois. All of the operations are within the multi-state MSA. Eight of the ten bank offices and 24 of the 32 ATMs are located in Illinois with the remaining two branches and eight ATMs in Iowa. All \$337 million of Metrobank's deposits (based on the FDIC's June 30, 2000 information) are from this assessment area. Over 57 percent of the bank's loans are made in the MSA.

Refer to the Market Profile for the Davenport-Moline-Rock Island MSA in Appendix B for detailed demographics and other performance context information for the assessment area.

## LENDING TEST

The bank's performance under the Lending Test is rated "High Satisfactory." Based on a fullscope review, the bank's performance in the Davenport-Moline-Rock Island MSA is good. We weighted the borrower distribution more heavily because the majority of the low- and moderateincome census tracts are not in close proximity to the bank's branch locations

#### **Lending Activity**

Metrobank's lending levels reflect adequate responsiveness to the needs of its assessment area. Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

In the Davenport-Moline-Rock Island MSA, approximately 84 percent of Metrobank's loans originated or purchased during the evaluation period were home mortgage loans; with small loans to businesses comprising the remaining 16 percent. Of the home mortgage loans, home improvement loans accounted for 56 percent, home purchase loans were 27 percent, and home mortgage refinance loans accounted for 16 percent. The remaining 1 percent is multi-family loans.

Metrobank's lending activity in the AA is adequate. Information on deposit market share, compiled by the FDIC for 1999, shows that the bank ranks fourth out of 42 institutions with a deposit market share of 6.34 percent in the MSA. Based on 1999 aggregate HMDA data, Metrobank ranks sixth of 298 HMDA reporters with a 2.38 percent market share. Metrobank ranks 7th of 212 lenders for home purchase lending with a market share of 2.38 percent. Metrobank ranks 2nd of 73 lenders for home improvement loans with a market share of 12.17 percent and 15th of 239 lenders for home refinance loans with a market share of 1.80 percent. Metrobank ranks 11th of 53 lenders with a 3.80 percent market share of small business loans.

## Distribution of Loans by Income Level of the Geography

The geographic distribution of Metrobank's home mortgage loans and small loans to businesses reflects adequate penetration throughout the full-scope AA geographies. Although the lending performance in low- and moderate-income geographies is below the percentage of owner-occupied units in these tracts, the majority of the low- and moderate-income census tracts within the AA (79 percent) are not in close proximity to any of the bank's branch locations. Eighty-three percent of the owner-occupied units located in low- and moderate-income census tracts are within these tracts. This limits the bank's ability to lend in these areas. Refer to the Description of Institution for branch location information. Additionally, the Market Profile for the Davenport-Moline-Rock Island MSA in Appendix B contains information on the census tract and owner-occupied housing distribution within the bank's AA.

Although the bank was not able to reach the low- and moderate-income tracts with its home mortgage lending, it was able to make small business loans in the moderate-income tracts. The bank's main commercial lending facility is located in the downtown area of East Moline, IL, which is a moderate-income census tract. This tract and an adjacent moderate-income tract in

the downtown area contain 188 small businesses. Of the 215 loans to small businesses that the bank originated within their AA, 38 (18 percent) were made within these two census tracts.

## Home Mortgage Loans

The overall geographic distribution of home mortgage loans is adequate in the Davenport-Moline-Rock Island MSA. Refer to Tables 2, 3 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.

The geographic distribution of home purchase loans is adequate. The home purchase loans made in the bank's low-income geographies (0.90 percent) are near the percentage of owner-occupied units (1.38 percent) in these geographies. The home purchase loans made in the bank's moderate-income geographies (10.54 percent) are below the percentage of owner-occupied units (13.54 percent) in those geographies. The market share for loans made in the low-income geographies (0.00 percent) and moderate-income geographies (1.67 percent) in the AA are below the overall market share (2.38 percent) for home purchase loans.

The geographic distribution of home improvement loans is adequate. The home improvement loans made in the bank's low-income geographies (0.43 percent) are below the percentage of owner-occupied units (1.38 percent) in these geographies. The home improvement loans made in the bank's moderate-income geographies (12.21 percent) are also below the percentage of owner-occupied units (13.54 percent) in these geographies. The bank's market share in the low-income geography (2.86 percent) is below the overall market share of 12.17 percent. The market share for loans made in the moderate-income geographies (14.48 percent) exceeds the overall market share (12.17 percent) for home improvement loans.

The geographic distribution of home refinance loans is adequate. The home refinance loans made in the bank's low-income geographies (0.49 percent) are below the percentage of owner-occupied units (1.38 percent) in these geographies. The refinance loans made in the bank's moderate-income geographies (8.37 percent) are less than the percentage of owner-occupied units (13.45 percent) in those geographies. The bank's market share in the low- and moderate-income geographies (0.81 and 1.15 percent, respectively) are below the overall market share of 1.80 percent.

## Small Loans to Businesses

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is adequate in the MSA. Metrobank's lending in low-income census tracts (1.86 percent) is below the percentage of businesses located in these tracts (6.52 percent). The bank's lending in moderate-income census tracts (28.84 percent) exceeds the percentage of the AA's businesses located in these tracts (21.56 percent). Metrobank's market share in low-income census tracts (1.35 percent) is below its market share overall (3.80 percent). The bank's market share in moderate-income census tracts (4.52 percent) exceeds its market share overall (3.80 percent).

## Lending Gap Analysis

Maps and reports detailing Metrobank's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified.

## Inside/Outside Ratio

The bank's overall performance of making loans within its assessment area was positively factored into the overall analysis of the geographic distribution of lending by income level of geographies. A substantial majority of home mortgage loans and small business loans, originated or purchased by Metrobank over the evaluation period were within the AA. Fifty-eight percent of the bank's home mortgage loans and ninety-eight percent of its small business loans were extended within the assessment area. Of the home mortgage loans, ninety-eight percent of its home purchase loans, ninety-eight percent of its home mortgage refinance loans, and forty-four percent of its home improvement loans are within their AA. Many of the bank's home improvement loans are the result of indirect lending with local companies. These companies do home improvement work in the five-state area surrounding the bank, increasing the percentage of home improvement loans outside of the AA.

## Distribution of Loans by Income Level of the Borrower

The borrower distribution of Metrobank's home mortgage loans and small loans to businesses reflects a good dispersion among borrowers of different income levels throughout the AA. Although the performance for home mortgage loans is good, the bank's record of lending to small businesses is adequate.

Consideration was given to the inability of low-income families to afford even a low-priced home. Using 1990 census data, 12.33 percent of the households in the AA are living below the poverty level. Income of the low-income borrower is \$25,900 or less. The average median housing price is \$49,446. Although some of the housing stock is affordable for a low-income borrower, most households living below the poverty level could not afford to purchase a home. Additionally, discussion with a community contact indicated that much of the affordable housing stock is in disrepair and needs considerable rehabilitation. The additional cost of rehabilitation prevents many low-income individuals from purchasing a home. This information affected the home mortgage conclusions regarding lending levels for loans to low-income borrowers. Refer to the Market Profile in Appendix B for more information.

## Home Mortgage Loans

The overall borrower distribution of home mortgage loans is good in the Davenport-Moline-Rock Island MSA. Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of lending to borrowers of different income levels for home purchase loans is good. Home purchase loans made to low-income borrowers (9.94 percent) are less than the percentage of low-income families (20.07 percent) in the AA. Home purchase loans made to moderate-income borrowers (28.61 percent) exceed the percentage of moderate-income families (17.92 percent) in the AA. Market share for loans made to low-income borrowers (2.53 percent) and moderate-income borrowers (3.80 percent) is greater than the overall market share (2.38 percent) for home purchase loans.

The distribution of lending to borrowers of different income levels for home improvement loans is good. Home improvement loans made to low-income borrowers (11.21 percent) are less than the percentage of low-income families (20.07 percent) in the AA. Home improvement loans made to moderate-income borrowers (25.72 percent) exceeded the percentage of moderate-income families (17.92 percent) in the AA. Market share for home improvement loans made to low-income borrowers (8.84 percent) is below the overall market share (12.17 percent). The market share for moderate-income borrowers (12.91 percent) slightly exceeds the overall market share (12.17 percent) for home improvement loans.

The distribution of lending to borrowers of different income levels for home refinance loans is good. Refinance loans made to low-income borrowers (9.85 percent) is less than the percentage of low-income families (20.07 percent) in the AA. Refinance loans made to moderate-income borrowers (19.70 percent) exceeds the percentage of moderate-income families (17.92 percent) in the AA. Market share for home refinance loans made to low-income borrowers (2.20 percent) and moderate-income borrowers (2.36 percent) is greater than the overall market share (1.80 percent) for home refinance loans.

## Small Loans to Businesses

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of lending to businesses of different sizes is adequate in the MSA. Metrobank made 55.81 percent of its small business loans to businesses with revenues of less than \$1 million. This is significantly below the percentage of businesses in the AA which report having revenues less than \$1 million (87.97 percent). However, Metrobank's performance is better than the percentage of loans reported on a combined basis by all lenders in this AA (52.15 percent). Metrobank's market share for loans with revenue of \$1 million or less (4.98 percent) exceeds its overall small business market share (3.80 percent).

## **Community Development Lending**

Metrobank's community development lending had a neutral impact on the overall lending test rating. Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.

The bank made one community development loan totaling \$228,000 during the evaluation period. The loan was to finance the purchase of ten single-family residences, all of which are in low- or moderate-income census tracts. The rents for these homes range from \$290 to \$540 a month and will provide affordable housing for low- and moderate-income individuals.

The bank has also made numerous loans that have community development characteristics, but they were required to be reported as and considered in the evaluation of home mortgage and/or small loans to businesses.

## **Product Innovation and Flexibility**

Product innovation and flexibility had a positive impact on the lending test conclusions for the Davenport-Moline-Rock Island MSA. Metrobank provides several flexible loan products. The following programs indicate the bank has been responsive to the affordable housing needs of the assessment area.

Metrobank is an active participant in the Illinois Housing Development Authority (IHDA) First-Time Homebuyers program. This program offers lower interest rates to low- and moderateincome first-time homebuyers. This program also allows homes in "targeted" census tracts to be purchased by non first-time buyers at below market interest rates. During this evaluation period, the bank made 33 loans totaling \$1.7 million.

Metrobank has formed a partnership with Project NOW, which is a community action agency. Through Project NOW, the bank originates loans for the purchase and rehabilitation of homes by low- and moderate-income borrowers. The bank has committed up to \$500,000 in first mortgage funds with loan values up to 97% of the purchase price. These mortgages will be 30 year fixed rate financing with market rate determined by Freddie Mac pricing. During the evaluation period, the bank made four loans totaling \$177,250 under this program.

The bank is involved in the East Moline "Assist" program, which is a program for first-time borrowers in the city limits of East Moline, Illinois. It provides below market interest rate financing and down payment assistance for low- and moderate-income borrowers. During the evaluation period, the bank made 16 loans totaling \$878,265.

The bank also participates with the Illinois League of Financial Institutions/Federal Home Loan Bank in their "Downpayment Plus" Affordable Housing Program. This program focuses on providing financial assistance in the form of grants to low- and moderate-income families who wish to purchase a home. These families lack the resources necessary to meet the downpayment requirements and closing costs associated with financing the purchase. In addition to downpayment and closing cost assistance, the program offers homebuyers counseling and up to two months principal, interest, taxes and insurance for emergency repairs, hardship, or postpurchase counseling. To be eligible for the grant, a borrower must have total annual household income that is 80% or less than the area median family income. During the evaluation period, the bank made one loan for \$20,000 under this program.

## **INVESTMENT TEST**

The bank's performance under the Investment Test is rated "Outstanding." Based on a full-scope review, the bank's performance in the Davenport-Moline-Rock Island MSA is excellent. Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Metrobank made an excellent level of investments in the Davenport-Moline-Rock Island MSA. During this evaluation period, the bank made five qualified community development investments totaling \$2,968,000 in the AA. Four additional investments for \$2,596,567, which were made in prior periods, remain outstanding on the bank's books. Metrobank made several large investments and in-kind donations to community development organizations in this MSA. Details of the investments and in-kind donations are listed below.

#### **Current Period Investments**

Metrobank purchased \$1,520,000 in fuel tax bonds designated to finance the Seventh Street Hill Project. In general, fuel taxes are collected by the state and allocated to municipalities on a per capita basis. Municipalities pledge to pay for the bonds through fuel tax receipts. The project made improvements to 7th Street, which is the main avenue from downtown East Moline (which is a moderate-income area) to the rest of the city. Although the street is not located in a low- or moderate-income census tract, the improvements were made to the main avenue, which connects the rest of the city to the two downtown moderate-income census tracts. This investment meets the definition of community development by revitalizing and stabilizing a moderate-income census tract through improvements to the infrastructure connecting it to the rest of the community. Also, the project is located in a Tax Increment Financing (TIF) District and is part of the Redeem project.

Metrobank purchased general obligation school building bonds in Rock Island County for the amount of \$408,000. The bonds' purpose is to acquire land, build and equip a new school building and improve the site. This promoted education targeted to low- and moderate-income individuals. The bank provided documentation that more than 50% of the students who attend the schools in this county were from low- and moderate-income families.

The bank purchased general obligation alternate bonds for the amount of \$1,000,000. The purpose of the bonds is to finance the construction of improvements to the sewer system of East Moline. This resulted in revitalization and stabilization of a moderate-income area by improving the infrastructure, as part of a larger plan to redevelop the moderate-income area comprised of the riverfront and downtown of East Moline.

Metrobank made in-kind donations to Revitalize and Develop East Moline (Redeem), a nonprofit organization. The bank donated two vacant lots and has donated office space, equipment and utilities since 1994. Each year the value of the office usage exceeds \$10,000. The vacant lots are to be used for community development purposes and appraised at \$20,000. The lots are in downtown East Moline, which is a moderate-income census tract. Redeem attracts buyers to construct commercial properties for small businesses to revitalize the downtown business district.

## **Prior Period Investments**

An investment was made in Great River Industrial Park in April 1997, which had a current book value of \$1,389,437. The industrial revenue bond was used to tear down an abandoned, dilapidated factory, and clean up the environmental damage. The site was a major polluted brown field site. This directly revitalized and stabilized a moderate-income census tract creating the potential to attract businesses and industries to the area. The Great River Industrial Park is one project in a series planned with Redeem.

The bank purchased general obligation bonds for North Hill Senior Housing Project in December 1995, which has a current book value of \$656,336. This enabled the conversion of an abandoned vacant school to housing for the elderly in a TIF District. This project provided affordable housing for low- and moderate-income persons.

Metrobank purchased revenue bonds in October 1993, which have a remaining book value of \$255,000. These bonds enabled East Moline to improve public areas and parks in a moderate-income area. This contributed to the revitalization and stabilization of this area.

General obligation bonds, currently totaling \$295,794, were purchased by Metrobank in October 1992. The funds were used for street and storm sewers in downtown East Moline. The project helped to revitalize and stabilize a moderate-income area by improving the infrastructure.

## SERVICE TEST

The bank's performance under the Service Test is rated "High Satisfactory." Based on a fullscope review, the bank's performance in the Davenport-Moline-Rock Island MSA is good. The level of community development services provided by Metrobank to this AA was a major factor in determining the overall rating for the Service Test.

#### **Retail Banking Services**

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch opening and closings.

Metrobank's delivery systems are accessible to geographies and individuals of different income levels throughout the AA. Metrobank operates ten full-service branches. Each branch has an automated teller machine (ATM) except the 42nd Avenue branch which has two. There are also twenty-one off-premise ATMs. The bank has not opened or closed any branches during the evaluation period.

The overall distribution of branches is considered good. Although there are no branches in lowincome census tracts, only 2.89% of the population in the AA live in the low-income tracts. The distribution of branches in moderate-income census tracts (20%) exceeds the percentage of the population which live in moderate-income tracts (16.08%).

Metrobank operates thirty-two ATMs in this AA. All ATMs are full-service, meaning they accept deposits and allow withdrawals. One ATM (3.13%) is located in a low-income census tract. Six ATMs (18.75%) are located in moderate-income census tracts. The distribution of ATMs in both low- and moderate-income census tracts exceeds the percentage of the population which live in these tracts.

Metrobank's hours and services offered throughout the AA provide adequate accessibility for all customers. The services offered are standard throughout the branch network. Nine of the ten branches offer Saturday hours and loan officers are available on Saturdays. The main bank, which is located in a moderate-income census tract in the downtown business district, is not open on Saturdays. The difference in hours does not negatively affect the community's ability to access services, as a full service branch with Saturday hours is located less than two miles away.

Metrobank offers some other alternative delivery systems including bank-by-phone and personal computer (PC) banking. PC banking allows customers to make account transfers, obtain balance information, and arrange for bill payment. Individuals cannot obtain loan applications via the Internet. Metrobank does not, however, monitor the usage of these alternative delivery services by low- and moderate-income individuals. Therefore, we did not place significant weight on these alternative delivery systems when drawing our CRA performance conclusions.

#### **Community Development Services**

Metrobank's performance in providing community development services in the Davenport-Moline-Rock Island MSA is good. Bank management invests numerous hours in community development programs targeted to low- and moderate-income individuals, positively impacting the Service Test rating. These services include providing credit counseling, first-time homebuyer seminars, financial planning, technical expertise to nonprofit or government organizations, school programs to develop financial management skills, and lending executives to organizations facilitating affordable housing construction/rehabilitation. The following paragraphs describe the CD services Metrobank provided during this evaluation period.

Smart Money Program: This program was designed by the State Treasurer's Office for Illinois residents. The program offers direct deposit "no cost" checking accounts to individuals receiving government benefit checks. The account is "no cost" regarding the first order of checks, allows ten withdrawals per monthly statement and has no minimum balance requirement. The bank product was developed and offered to low- and moderate-income individuals in conjunction with the State Treasurer's Office.

Revitalize and Develop East Moline (Redeem): Redeem is a nonprofit organization committed to the revitalization and stabilization of East Moline. A bank executive serves as a Board member to this organization which contributes to the economic revitalization and development of a moderate-income area. The bank executive reviews requests for grants and loan applications submitted to Redeem. Additionally, when private funding is sought the executive presents applications to the bank's loan committee.

East Moline Steering Committee: This nonprofit organization was organized to perform environmental analysis/redevelopment planning for the river front and downtown areas of East Moline. The steering committee is associated with Redeem and provides for the economic revitalization and development of a moderate-income census tract. A bank executive participates on this committee and reviews requests for grants and development applications. Additionally, when private funding is sought the executive submits applications to the bank's loan committee.

Hearts and Hammers: This nonprofit organization rehabs homes for low- and moderate-income families within the bank's assessment area. The organization provides credit information and performs credit counseling to these individuals. As a result of the credit counseling, Metrobank has extended loans to several low- and moderate-income families. The bank participates in this project by lending an executive to the organization facilitating affordable housing construction/rehabilitation for low- and moderate-income individuals. Also, bank employees provide credit counseling and home ownership counseling to these individuals.

Illinois Housing Development Authority and Rural Development Low Income Program: Metrobank assists this organization in providing a homebuyer seminar that helps qualify firsttime homebuyers with low- and moderate-incomes. The program is a new concept offering home financing in smaller rural communities. Credit information is reviewed and individuals are pre-approved. The bank's participation in this program provides credit and home ownership counseling to low- and moderate-income individuals.

Economic Development Commission of East Moline: The commission oversees requests for funding from a revolving loan fund and approves requests regarding land sales in an industrial park. The commission receives state and local government money and contributes to the economic revitalization and development of a moderate-income area. A bank employee serves on this organization's board of directors. He provides advice to the commission regarding the adequacy of business plans submitted by organizations requesting funds.

Skills Incorporated/East Moline Mainstreet: Skills Incorporated is a nonprofit vocational training and educational organization targeted to low-income individuals who are disabled and unemployed. East Moline Mainstreet is an organization dedicated to improving and encouraging economic development of downtown East Moline. A Metrobank employee serves as the treasurer for both of these organizations. The employee develops financial planning and monitors the financial status of the organizations. Also, the bank provides checking services to Skills Incorporated.

Financial Education and Technical Assistance: The bank has offered several homebuyer seminars and provided credit counseling in various capacities since the last exam. A bank employee has taught credit classes for over five years during the spring and fall semesters at a school in East Moline, which is in a moderate-income census tract. The bank's participation in the school program helps develop financial management skills for low- and moderate-income individuals.

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term "Full-Scope") and those that received a less comprehensive review (designated by the term "Limited-Scope").

Time Period Reviewed	Investment Test: Nov	uary 1, 1999 to December 31, 2000 vember 2, 1998 to March 19, 2001 vember 2, 1998 to March 19, 2001
Financial Institution		Products Reviewed
Metrobank, N.A. (Metrobank) Davenport, Iowa	-	HMDA, Small Business & Community Development
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and '	Type of Examination	
Assessment Area	Type of Exam	Other Information
Iowa/Illinois Davenport-Moline-Rock Island MSA #1960	Full-Scope	

## Appendix B: Market Profiles for Full-Scope Areas

## **Table of Contents**

Market Profiles for Areas Receiving Full-Scope Reviews	
Davenport-Moline-Rock Island MSA # 1960	B-2

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Demographic Information for F	Full Scope	Area: Da	venport-Molin	e-Rock Islan	d MSA	
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	96	7.29	22.92	54.17	15.63	0.00
Population by Geography	350,86 1	2.89	16.08	64.48	16.55	0.00
Owner-Occupied Housing by Geography	92,433	1.38	13.45	66.73	18.43	0.00
Business by Geography	13,112	6.52	21.56	55.79	16.13	0.00
Farms by Geography	1,692	0.12	4.31	84.87	10.70	0.00
Family Distribution by Income Level	94,999	20.07	17.92	23.32	38.69	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	36,091	4.78	22.60	63.58	9.04	0.00
Median Family Income		34,082	Median Hous	•	49,502446	
HUD Adjusted Median Family Ir 2000		51,800	Unemployme (1990 US Ce		3.88%	
Households Below Poverty Level	1	12.33%			1 :	

## Davenport-Moline-Rock Island MSA

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

Source: 1990 US Census and HUD update MFI

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Davenport - Moline - Rock Island, Iowa - Illinois MSA

Metrobank's assessment area (AA) is comprised of the entire Davenport-Moline-Rock Island multi-state MSA (# 1960), located along the Illinois and Iowa state line. Larger cities in this MSA are Rock Island, Moline and East Moline in Illinois and Bettendorf and Davenport in Iowa. The Mississippi River, along the Illinois and Iowa State line, is a major barrier between the two states.

This MSA consists of 96 census tracts in Rock Island and Henry counties in Illinois, and Scott County in Iowa. Of these census tracts, seven are low-income, having 1,280 owner-occupied units, and twenty-two are moderate-income, having 12,436 owner-occupied units. One hundred percent of the low-income tracts and 55 percent of the moderate-income tracts (containing 5,917 of the owner-occupied units) are located on the western edge of the bank's AA and are concentrated along the Mississippi River. These geographies are separated from seven of the bank's ten branches by Interstate 74, a major physical barrier. Of the three branches located west of Interstate 74, two are located to the far north and one to the far south of this concentration of low- and moderate-income census tracts. An additional 18 percent of the moderate-income census tracts (containing 3,069 owner-occupied units) are located in the southeastern portion of Henry County, Illinois, where there are no branch locations. Based on the above facts, 10,266 of the owner-occupied units ( 83 percent) in low- or moderate-income geographies are not in close proximity to any of the bank's branch locations.

Metrobank has 10 offices located throughout the MSA. As of June 30, 2000, 100 percent of Metrobank's deposits were derived from this MSA. Over the evaluation period, 57.5 percent of the home mortgage loans and 97.7 percent of the small loans to businesses were derived from this MSA. Metrobank also serves the MSA with 32 deposit taking ATMs, 24 in Illinois and eight in Iowa. The ATMs are located throughout the area, with at least one at each branch location and 21 off-premise sites.

Metrobank's deposits in the MSA total approximately \$337 million. Based on FDIC deposit market share data as of June 30, 2000, this equates to a 6.34 percent deposit market share. Metrobank ranks as the fourth largest deposit taking institution in the MSA. The leading deposit taking institution has a 12.71 percent market share. Major competitors in this area include Wells Fargo Bank Iowa, National Association; Firstar Bank, National Association; Bank One Trust Company, National Association; and First Midwest Bank, National Association.

The service industry is the largest industry in the MSA, followed by retail trade and manufacturing. Major employers in the MSA are: Deere & Company, a farm implement manufacturer with 7,800 employees; Rock Island Arsenal, a federal munitions depot and manufacturing facility with 6,000 employees; Genesis Medical Center with 3,000 employees; and ALCOA, an aluminum-steel manufacturer with 2,600 employees.

The unemployment level for the MSA averaged 4.4 percent in 1999, compared to the Illinois State unemployment rate of 4.3 percent, the Iowa State unemployment rate of 2.5 percent and the U.S. unemployment rate of 4.2 percent.

Two community contacts were made in this MSA during the evaluation. We contacted one organization in each state of the Davenport-Moline-Rock Island MSA. The contacts included one community development organization and one affordable housing organization. The contacts indicated the major credit needs are affordable housing and small business lending.

Based on the demographics of the MSA and the identified needs of more affordable housing and small business financing, unmet credit and community development needs exist in the MSA. A moderate level of community resources and opportunities for partnerships exist to facilitate activities to address the unmet credit and community development needs of the MSA. These conclusions are based on discussions with community groups and our review of CRA performance evaluations of other banks operating in the MSA. Community resources and opportunities for partnership exist with nonprofit housing organizations, community service organizations, credit counseling agencies, and small business development centers. Competition for community development loans, investments, and services is moderate and consists primarily of the other financial institutions that operate in the MSA.

#### **Content of Standardized Tables**

A separate set of tables is provided for each state. 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 and purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/assessment area.

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

- Table 1.Lending Volume Presents the number and dollar amount of reportable loans<br/>originated and purchased by the bank over the evaluation period by<br/>MSA/assessment area.
- Table 2.Geographic Distribution of Home Purchase Loans Compares the percentage<br/>distribution of the number of loans originated and purchased by the bank in low-,<br/>moderate-, middle- and upper-income geographies to the percentage distribution of<br/>owner-occupied housing units throughout those geographies. The table also<br/>presents market rank and market share information based on the most recent<br/>aggregate market data available.
- **Table 3.Geographic Distribution of Home Improvement Loans -** See Table 2.
- Table 4.Geographic Distribution of Refinance Loans See Table 2.
- Table 5.Geographic Distribution of Small Loans to Businesses The percentage<br/>distribution of the number of small loans (less than or equal to \$1 million) to<br/>businesses originated and purchased by the bank in low-, moderate-, middle- and<br/>upper-income geographies compared to the percentage distribution of businesses<br/>(regardless of revenue size) throughout those geographies. The table also presents<br/>market rank and market share information based on the most recent aggregate<br/>market data available.
- Table 6.Geographic Distribution of Small Loans to Farms The percentage distribution<br/>of the number of small loans (less than or equal to \$500,000) to farms originated<br/>and purchased by the bank in low-, moderate-, middle- and upper-income<br/>geographies compared to the percentage distribution of farms (regardless of revenue<br/>size) throughout those geographies. The table also presents market rank and market<br/>share information based on the most recent aggregate market data available.

- Table 7.Borrower Distribution of Home Purchase Loans Compares the percentage<br/>distribution of the number of loans originated and purchased by the bank to low-,<br/>moderate-, middle- and upper-income borrowers to the percentage distribution of<br/>families by income level in each MSA/assessment area. The table also presents<br/>market rank and market share information based on the most recent aggregate<br/>market data available.
- Table 8.Borrower Distribution of Home Improvement Loans See Table 7.
- Table 9.Borrower Distribution of Refinance Loans See Table 7.
- Table 10. 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 11. Borrower Distribution of Small Loans to Farms** Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 12. 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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.

- Table 13.Distribution of Branch Delivery System and Branch Openings/Closings -<br/>Compares the percentage distribution of the number of the bank's branches in low-,<br/>moderate-, middle- and upper-income geographies to the percentage of the<br/>population within each geography in each MSA/AA. The table also presents data<br/>on branch openings and closings in each MSA/AA.
- **Table 14.** 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-, middleand upper-income geographies to the percentage distribution of the population 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.

LENDING VOLUME	Evaluation Period: 01/01/1999 TO 12/31/2000														
	% of Rated Area Deposits	Home N	Nortgage	Small Loans t	to Businesses	Small Loan	s to Farms	Community	Development	Total Repo	orted Loans	% of Rated Area Loans			
	in MSA/AA*											(#) in AA			
MSA/Assessment Area		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)				
Full Scope															
Davenport-Moline-Rock Island MSA	100.00	1,235	46,219	215	16,082	0	0	1	228	1,451	62,529	100.00			

#### Table 1. Lending Volume

#### Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HO	ME PURCHASE				E	Evaluation P	<b>Period</b> : 01/01/	1999 TO 12/	31/2000							
																Home se Loans
MSA/Assessment Area	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	Rank*	Overall	Low	Mod	Mid	Ирр	#	% of Total**
Full Scope																
Davenport-Moline-Rock Island MSA	1.38	0.90	13.45	10.54	66.73	75.90	18.43	12.65	7	2.38	0.00	1.67	2.70	1.86	332	100.00

\* Deposit Data as of June 30, 1999

\*\* 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.

<sup>\*</sup> Based on 1999 Aggregate HMDA Data Only. Market rank is for all income categories combined.

#### Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HO	ME IMPROVEN	IENT				Evaluation	1 Period: 01/	01/1999 TO 1	12/31/2000							
	Low Ir Geogra		Moderate Geogra		Middle Geogra		Upper I Geogra		Overall Market		Market S	hare by Ge	eography*			Home nent Loans
MSA/Assessment Area	% Owner Occ Units	% Bank Loans	Rank*	Overall	Low	Mod	Mid	Ирр	#	% of Total**						
Full Scope																
Davenport-Moline-Rock Island MSA	1.38	0.43	13.45	12.21	66.73	76.01	18.43	11.35	2	12.17	2.86	14.48	13.38	6.17	696	100.00

#### Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HO	rr · · · · · · · · · · · · · · · · · ·															
MSA/Assessment Area	Low Ir Geogra		Moderate Geogra		Middle Geogra		Upper Geogra		Overall Market Rank*		Market S	Share by Ge	eography*		Mortgage	Home Refinance ans
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Ирр	#	% of Total**
Full Scope																
Davenport-Moline-Rock Island MSA	1.38	0.49	13.45	8.37	66.73	78.33	18.43	12.81	15	1.80	0.81	1.15	2.20	0.96	203	100.00

\* Based on 1999 Aggregate HMDA Data Only. Market rank is for all income categories combined.

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

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

<sup>\*</sup> Based on 1999 Aggregate HMDA Data Only. Market rank is for all income categories combined.

#### Table 5. Geographic Distribution: Small Loans to Businesses

Geographic Distribution: SM	ALL BUSINESS				Ev	aluation P	eriod: 01/01/19	999 TO 12/3	1/2000							
	Low Inc Geograp		Moderate I Geograp		Middle In Geograp		Upper Ind Geograp		Overall Market		Market S	hare by Ge	ography*			Small s Loans
MSA/Assessment Area	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	Rank*	Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Davenport-Moline-Rock Island MSA	6.52	1.86	21.56	28.84	55.79	56.74	16.13	12.56	11	3.80	1.35	4.52	4.13	2.99	215	100.00

#### Table 6. Geographic Distribution: Small Loans to Farms

Geographic Distribution: SM																
	Geographies Geographies Geographies Market Loans															
MSA/Assessment Area	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	Rank*	Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Davenport-Moline-Rock Island MSA	0.12	0.00	4.31	0.00	84.87	0.00	10.70	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00

<sup>\*</sup> Based on 1999 Aggregate Small Business Data Only. Market rank is for all income categories combined.

<sup>\*\*</sup> 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.

<sup>\*</sup> Based on 1999 Aggregate Small Business Data Only. Market rank is for all income categories combined.

<sup>\*\*</sup> Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

#### Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMD	A HOME PUR	CHASE				Evaluatio	n <b>Period</b> : 01/	01/1999 TO	12/31/2000							
	Low Income	Borrowers	Moderate Borrov		Middle Borrov		Upper I Borrov		Overall Market	Μ	larket Shar	e by Borrov	wer Income	*		Home se Loans
MSA/Assessment Area	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	Rank*	Overall	Low	Mod	Mid	Upp	#	% of Total***
Full Scope																
Davenport-Moline-Rock Island MSA	20.07	9.94	17.92	28.61	23.32	28.61	38.69	30.42	7	2.38	2.53	3.80	3.06	2.54	332	100.00

#### Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HON	Borrower Distribution: HOME IMPROVEMENT Evaluation Period: 01/01/1999 TO 12/31/2000																
				e Income Middle Income owers Borrowers			Upper Income Borrowers		Overall Market	Market Share By Borrower Income*					Total Home Improvement Loans		
MSA/Assessment Area	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	Rank*	Overall	Low	Mod	Mid	Upp	#	% of Total***	
Full Scope	Full Scope																
Davenport-Moline-Rock Island MSA	20.07	11.21	17.92	25.72	23.32	27.73	38.69	32.18	2	12.17	8.84	12.91	12.50	11.97	696	100.00	

<sup>\*</sup> Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 2.41% of loans originated by BANK.

<sup>\*\*\*</sup> 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.

<sup>\*</sup> Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 3.16% of loans originated by BANK.

<sup>\*\*\*</sup> Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Borrower Distribution: HON	NE MORTGAGE	REFINANCE				Evalua	tion Period: (	01/01/1999 T	0 12/31/2000	I						
MSA/Assessment Area	Low Income Borrowers Moderate Income Borrowers				Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	N	larket Shai	Total Home Mortgage Refinance Loans				
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Ирр	#	% of Total***
Full Scope																
Davenport-Moline-Rock Island MSA	20.07	9.85	17.92	19.70	23.32	30.05	38.69	37.93	15	1.80	2.20	2.36	2.05	2.29	203	100.00

#### Table 9. Borrower Distribution of Home Mortgage Refinance Loans

#### Table10. Borrower Distribution: Small Loans to Businesses

Borrower Distribution: SMAL									
MSA/Assessment Area		Vith Revenues ion or less	% Distribution of	Loans by Original A of Business Size	Amount Regardless		Total Small Loans to Businesses		
	% Business**	% Bank Loans***	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****
Full Scope									
Davenport-Moline-Rock Island MSA	87.97	55.81	83.72	8.37	7.91	3.80	4.98	215	100.00

<sup>\*</sup> Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 2.46% of loans originated by BANK.

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

<sup>\*</sup> The market consists of all other Small Business reporters in BANK's assessment area and is based on 1999 Aggregate Small Business Data only

<sup>\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses.

<sup>\*\*\*</sup> 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 14.42% of small loans to businesses originated and purchased by the bank.

<sup>\*\*\*\*</sup> 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.

#### Table11. Borrower Distribution: Small Loans to Farms

Borrower Distribution: SMALL FARM Evaluation Period: 01/01/1999 TO 12/31/2000											
	Businesses Wi Of \$ 1milli			stribution Loans by C nt Regardless of Far		Mai	rket Share*	Total Small Farm Loans			
MSA/Assessment Area	% Farms**	% Bank Loans***	\$100,000 or less	>\$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****		
Full Scope											
Davenport-Moline-Rock Island MSA	99.41	0.00	0.00	0.00	0.00	0.00	0.00	0	0.00		

#### Table 12. Qualified Investments

QUALIFIED INVESTMENTS	QUALIFIED INVESTMENTS Evaluation Period: 01/01/1999 T0 12/31/2000														
	Prior Period Investments* Current Period Investments					Total Investments		Unfunded Commitments**							
MSA/Assessment Area	# \$(000's)		# \$(000's)		#	# \$(000's)		#	\$(000's)						
Full Scope	Full Scope														
Davenport-Moline-Rock Island MSA	4	2,597	5	2,968	9	5,565	100.00	0	0						

<sup>\*</sup> The market consists of all other Small Farm reporters in BANK's assessment area and is based on 1999 Aggregate Small Business Data Only

<sup>\*\*</sup> Farms with revenues of \$1 million or less as a percentage of all farms.

<sup>\*\*\*</sup> As a percentage of loans with borrower income information available.

<sup>1\*\*\*\*</sup> Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\* &#</sup>x27;Prior Period Investments' means investments made in a previous evaluation period that remains outstanding.

<sup>\*\* &</sup>quot;Unfunded Commitments" means legally binding commitments reported on Report of Condition Schedule L."Off-Balance Sheet Items".

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#### Charter Number: 10000023175

#### Table13. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANC	uation Period: 01/01/1999 TO 12/31/2000																	
MSA/Assessment Area	Deposits			Branc	hes			Branch Openings/Closings							Population			
	% of Rated	# of Bank	% of Rated	Location of Branches by Income of Geographies (%)			# of	# of	Net change in Location of Branches (+ or - )				% of the Population with Each Geography*					
	Area Deposits in	Branches	Branches Area Branches in	Low	Mod	Mid	Upp	Branch Closings	Branch Openings	Low	Mod	Mid	Ирр	Low	Mod	Mid	Ирр	
Full Scope	MSA/AA		MSA/AA															
Davenport-Moline-Rock Island MSA	100.00	10	100.00	0.00	20.00	60.00	20.00	0	0	0	0	0	0	2.89	16.08	64.48	16.55	

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 $<sup>^{*}</sup>$  The percentage of the population in the MSA/AA that resides in these geographies.