



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

October 29, 2012

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Mutual of Omaha Bank
Charter Number: **708146**

3333 Farnam Street
Omaha, Nebraska 68131

Office of the Comptroller of the Currency

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Omaha, Nebraska 68154-5298

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 **Satisfactory**.

The following table indicates the performance level of Mutual of Omaha Bank with respect to the lending, investment, and service tests:

Performance Levels	Mutual of Omaha Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	X
Low Satisfactory	X		
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:

- Mutual of Omaha Bank’s (MOB) lending activity, overall, reflects good responsiveness to community credit needs. Responsiveness varied by market area with excellent performance in Nebraska and adequate performance in Arizona, the bank’s two principal market states based on retail deposits.
- The geographic distribution of MOB’s loans reflects good penetration. The bank had good geographic performance in Nebraska and excellent performance in Arizona.
- The distribution of MOB’s loans by borrower income characteristics reflects adequate penetration. Performance in both of the bank’s primary market states is adequate.
- MOB originated an adequate level of community development loans. Community development lending in Nebraska was good and adequate in Arizona. The bank’s community development lending has a positive impact on the bank’s CRA performance.
- A high percentage of MOB’s HMDA and CRA reportable loans were granted within its combined assessment areas. By number, approximately 77 percent of all home mortgage loans and 83 percent of all small business loans granted by the bank were within the bank’s combined assessment areas.
- MOB makes a satisfactory amount of qualified community development investments that are responsive to community needs. The bank makes significant investments in its primary market

states but not necessarily with community development as the primary purpose. As such, qualifying investments in Nebraska are adequate and excellent in Arizona. The bank also made relatively high levels of qualifying investments in California, Colorado, Nevada, and Texas.

- MOB's branch and alternative delivery systems are readily accessible to the bank's geographies and individuals of different income levels. MOB provides a good level of community development services. Performance in Nebraska is good and performance in Arizona is excellent.

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 MA/assessment area.

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

Community Development: 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:

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Community 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 householder’ 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 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 applications, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 MA/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 Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

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 nonfarm or nonresidential real estate or are classified as commercial and industrial 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 One 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 at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

MOB is a federally chartered stock savings bank headquartered in Omaha, Nebraska. As of March 31, 2012, MOB reported total assets of \$5.7 billion and total capital of \$476 million. Omaha Financial Holding, Inc. (OFHI) is the sole shareholder of MOB.

MOB is a second tier subsidiary of Mutual of Omaha Insurance Company (MOIC), an insurance and financial services company founded in 1909. OFHI was created by MOIC in 2007 as the first tier holding company for MOIC's banking initiatives. OFHI acquired Security Federal Savings, Lincoln, NE (Security) effective October 25, 2007, changed its name to Mutual of Omaha Bank and relocated the home office to MOIC's corporate campus in Omaha, NE. MOB became the successor thrift to Security, which specialized in mortgage banking and had \$113.1 million of total assets at September 30, 2007. The nearly simultaneous acquisition and merger of Peak National Bank, Nederland, CO, which reported \$211.7 million of total assets, and Nebraska State Bank of Omaha, NE, which reported \$269.5 million of total assets, were included as part of OFHI's acquisition and merger application with the Office of Thrift Supervision.

As part of its growth initiatives, on July 25, 2008, MOB entered into a transaction to assume \$3.0 billion of deposits and purchase certain assets from the FDIC, acting in its capacity as receiver for First National Bank of Nevada (FNBN) and its affiliate First Heritage Bank. MOB received \$2.6 billion from the FDIC as part of this transaction, which more than quadrupled total assets and expanded the bank's operations into Arizona, California, and Nevada. The only other acquisition has been \$119.6 million of assets and \$117.1 million of deposits from the FDIC related to its receivership of Marco Community Bank, a bank located in Marco Island, FL, on February 19, 2010. An FDIC loss-sharing agreement covered \$104.8 million of acquired assets.

MOB is a full-service financial institution that offers a full range of credit products including consumer, commercial, small business, and real estate loans. As of March 31, 2012, MOB total loans were \$4 billion. Real estate loans totaled \$3.4 billion or 85 percent, commercial loans totaled \$494 million or 12 percent, individual loans totaled \$17 million, and other loans total \$237 million or 6 percent. Net loans and leases represented 71 percent of average assets.

As of June 30, 2012, MOB operated as an interstate bank with branches in Arizona, California, Colorado, Florida, Hawaii, Missouri, Nebraska, Nevada, and Texas. There are 12 branches in Arizona, two in California, seven in Colorado, four in Florida, one in Hawaii, one in Missouri, seven in Nebraska, eight in Nevada, and four in Texas. Additionally, MOB has loan production offices in Florida, Iowa, and Kansas.

MOB affiliates include MOIC, East Campus Realty, LLC; Mutual of Omaha Investor Services, Inc.; United of Omaha Life Insurance Company; and Companion Life Insurance Company. MOIC is a top provider of life, annuity, and health insurance and sells individual and group products in all 50 states. East Campus Realty, LLC is an urban mixed-use development consisting of retail space, condominiums,

apartments, and parking facilities (Midtown Crossing at Turner Park). Mutual of Omaha Investor Services, Inc. acts as a broker/dealer organization to promote the sale of mutual funds and other companies' variable products. United of Omaha Life Insurance Company offers a range of individual and group insurance products in all states except New York. Companion Life Insurance Company offers individual life, annuities, and group life insurance through career agents, direct mail, brokers, and financial institutions in the state of New York.

MOB has one subsidiary. CondoCerts.com, Inc. was acquired in 2008 through a stock purchase agreement by the FDIC as Receiver for the First National Bank of Nevada. CondoCerts.com, Inc. was formed for the purpose of handling management services for common interest community associations.

MOB was last examined under CRA as of August 18, 2008 as a small bank operating with three full-scope assessment areas in two states. The 2008 CRA examination rating was "satisfactory". Due to the aforementioned merger and growth activity, MOB is now examined as a large bank.

There are no legal, financial, or other impediments that would hamper the bank's ability to help meet the credit needs of its assessment areas (AAs).

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. In evaluating the bank's lending performance, we reviewed their residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA), small loans to businesses, and community development (CD) loans. With the exception of CD loans, the evaluation period for the Lending Test is April 1, 2008 through December 31, 2011. For CD loans and the Investment and Service Tests, the evaluation period is August 19, 2008 through October 29, 2012. The Investment Test includes a review of investments, grants, and donations made in the bank's AAs that meet the definition of community development investments. The Service Test evaluation is based on branch distribution, hours of operation, branch openings and closings, alternative delivery systems, retail and commercial loan and deposit products and services, and community development services provided in the bank's AAs.

In late 2007, the national economy fell into a recession and housing prices fell, while unemployment, mortgage delinquencies, and foreclosures increased across the country. These events made it more difficult for banks to attract qualified loan applicants for most of the evaluation period. The impact of the recession, however, varied by assessment area and often varied within each assessment area.

Appendix D contains tables with data used to evaluate the bank's performance.

Data Integrity

We performed onsite verification of the accuracy of data available to the public as of June 30, 2011 in accordance with the CRA regulations. This public data included home mortgage loans (HMDA data) and loans to small businesses (CRA data).

At the conclusion of this review, we determined that management was accurately obtaining and reporting its HMDA-reportable loans. However, we identified that management was not accurately obtaining and reporting CRA data, and we had concerns about the bank's practices related to the reporting of purchased HMDA loans. Management performed a file review of its small business loans and corrected the errors. Management also provided additional analysis of its purchased HMDA-reportable loans to support that its reporting of such loans is reliable.

Selection of Areas for Full Scope Review

In each state where the bank has an office, a sample of assessment areas (AAs) within that state was selected for full scope reviews. MOB opened its first branch in Hawaii (Honolulu) in June 2012; MOB opened its first branch in Lee County, FL (Fort Myers) in August 2011; and MOB opened its first branch in Missouri (Kansas City) in June 2011. For purposes of this evaluation, we did not evaluate

performance in the states of Hawaii and Missouri nor in Lee County, FL as these assessment areas are too new to have sufficient loan volumes to derive statistically valid conclusions and too new to reasonably be expected to have provided sufficient levels of community development outreach and activities.

Refer to the “Scope” section under each state rating for details regarding how the areas were selected and why they are representative.

Ratings

The bank’s overall rating is a blend of the state ratings. Performance in the states of Nebraska and Arizona receive the greatest weight in our determination of the overall rating. These states account for 43 percent of the branch network, 54 percent of total deposits, and 80 percent of the HMDA and CRA reportable loans during the evaluation period.

The state ratings are based primarily on those areas that received full scope reviews. Refer to the “Scope” section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. § 25.28(c), or 12 C.F.R. § 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

State Ratings

State of Nebraska

CRA Rating for Nebraska:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- MOB's High Satisfactory Lending Test rating is based on performance in both Nebraska AAs with more weight given to performance in the Omaha AA, from which a significant proportion of its deposits are derived. MOB demonstrates good lending activity, good geographic distributions, and adequate overall borrower income distributions. Community development lending also has a positive impact on the overall Lending Test performance.
- MOB's Low Satisfactory Investment Test rating in its Nebraska AAs is based on its adequate level of investments in the Omaha AA.
- MOB's High Satisfactory Service Test rating in Nebraska AAs is demonstrated by excellent accessibility of its delivery systems to individuals and geographies of different income levels, hours of operation and ATM distributions tailored to the needs of the community, and an adequate level of community development services.

Description of Institution's Operations in Nebraska

MOB has designated Douglas and Sarpy Counties as its Omaha AA and Lancaster County as its Lincoln AA. As of the date of this evaluation, MOB had 7 branch locations and 10 automated teller machines (ATMs) in the State of Nebraska, including at its headquarter offices. As of June 30, 2012, retail deposits in its Nebraska branches totaled \$615 million. Deposits at MOB's main branch in Omaha exceed \$2 billion, however, a significant proportion of those deposits are associated with the bank's Community Association Banking (CAB) management services. CAB deposits are not derived through the bank's retail deposit channels, as such we adjusted deposits held in Omaha branches to reflect only retail deposits. The bank originated 6,818 home mortgage and small business loans totaling \$1 billion in its combined Nebraska assessment areas during the evaluation period.

While 88 percent of state deposits are held in the Omaha AA branches, 55 percent of its reportable loans were granted within the Lincoln AA. According to FDIC deposit market share information, MOB ranked 9th in the Omaha AA with a deposit market share of 3.0 percent and ranked 14th in the Lincoln AA with a deposit market share of 1.3 percent. MOB ranked 11th out of 289 HMDA reporters with a market share of 2 percent of the number of HMDA-reportable loans granted in the Omaha AA in 2011. MOB ranked 8th out of 187 HMDA reporters with a market share of 4 percent of the number of HMDA

loans granted in the Lincoln AA. Generally, full scope reviews cover assessment areas that hold the majority of the deposits for a given state. However, lending in Nebraska represents a significant proportion of all lending bank wide and lending in the Lincoln AA represents the majority of lending within Nebraska. For purposes of this evaluation, we performed full scope reviews of the bank's performance in both assessment areas.

MOB offers a full range of credit products, including consumer, credit card, commercial, and real estate loans.

Refer to the Market Profile for the state of Nebraska in Appendix C for detailed demographics and other performance context information for the assessment areas that received full scope reviews.

Scope of Evaluation in Nebraska

We performed a full scope review of CRA performance in the Omaha AA and the Lincoln AA. With 26 percent of total retail deposits and 71 percent of total reportable lending, performance in the state of Nebraska carries significant weight in the overall performance rating.

When determining conclusions for the Lending Test, we weighted loan products by number of loans over the evaluation period. In both AAs in Nebraska, we weighted home mortgage products (HMDA-reportable loans) more heavily than small loans to businesses. During the evaluation period, home mortgage loans represented 96 percent of total reported loans in the combined AAs, while small loans to businesses represented 4 percent of the total. Among HMDA loan categories, home refinance, home purchase, home improvement, and multifamily loans represented 80.8 percent, 16.7 percent, 1.9 percent and 0.6 percent of total HMDA reported loans, respectively. The bank did not report any small loans to farms.

We contacted two community organizations in the Omaha area. One community contact was an economic development organization and the other was an affordable housing organization. Both groups indicated that while credit standards have tightened, local financial institutions are doing a good job being involved with the community. Institutions participate in community development opportunities, such as loan pools, membership with community development organizations, Habitat for Humanity, and others. One contact also specifically mentioned how the Community Reinvestment Act has had a very positive impact on community involvement in this area.

The data in the tables in Appendix D includes all reportable loans within the bank's AAs. This includes originations and purchases of residential mortgage loans and originations of loans targeted to businesses. When evaluating the geographic and borrower distribution of home mortgage loans and small loans to businesses within the AAs, we emphasized the distribution of loan originations from products targeted to the local AA. The bank primarily used these products to help meet community credit needs.

LENDING TEST

Conclusions for Areas Receiving Full Scope Reviews

The bank's performance under the Lending Test in Nebraska is rated High Satisfactory. Based on full scope reviews, the bank's performance in the Omaha AA is good and adequate in the Lincoln AA.

Lending Activity

Refer to Table 1 Lending Volume in the state of Nebraska section of Appendix D for the facts and data used to evaluate the bank's lending activity.

MOB's lending activity in the Omaha AA and Lincoln AA reflect excellent responsiveness to AA credit needs. MOB has a significant presence in its two Nebraska AAs. Over the evaluation period, MOB originated or purchased 6,549 reportable home mortgage loans totaling \$1 billion, 269 reportable small business loans totaling \$46 million, and 8 community development loans totaling \$61 million in its combined Nebraska AAs.

In the state of Nebraska, home mortgage loans represent the majority of the bank's reportable lending activity at 96 percent of total reportable loans by both number and dollar volume. As a percent of mortgage loans, home refinance represents 81 percent of total mortgage loans, home purchase loans represents 17 percent, home improvement loans represent 2 percent and multifamily loans represent less than 1 percent. Small business loans granted by MOB in its Nebraska AAs represent 4 percent of its reportable loans by both number and dollar volume.

Omaha AA

In the Omaha AA, MOB granted 3,067 HMDA- and CRA-reportable loans totaling \$596 million and 4 community development loans totaling \$54 million. Based on deposits held in area branches as of June 30, 2012, MOB's local reportable loan-to-local deposit ratio is 110 percent, reflecting an excellent level of lending in the AA.

Based on FDIC Deposit Market Share data as of June 30, 2012, MOB held a 3.0 percent market share of the dollar amount of deposits, ranking 10th among 37 FDIC insured financial institutions in the AA. By comparison, in 2011, the bank achieved a 2.6 percent market share by number of home refinance loans, ranking 8th among 249 reporting lenders and the bank achieved a 0.9 percent market share by number of home purchase loans, ranking 24th among 201 reporting lenders. MOB achieved a 1.2 percent market share by number of small loans to businesses. Home improvement and multifamily lending, combined, represented less than 4 percent of total HMDA-reportable lending and have little impact on the rating for the state of Nebraska. Considering the large volume of mortgage loans originated in the AA by megabanks, large regional banks, and mortgage companies, these market ranks/shares are considered

excellent when compared to the deposit market rank/share. Many of the larger mortgage lenders do not take deposits in the AA, distorting the comparisons to deposit market share.

Lincoln AA

In the Lincoln AA, MOB granted 3,751 HMDA- and CRA-reportable loans totaling \$576 million and 4 community development loans totaling \$7 million. Based on deposits held in area branches as of June 30, 2012, MOB's local reportable loan-to-local deposit ratio is 768 percent, reflecting an excellent level of lending in the AA.

Based on FDIC Deposit Market Share data as of June 30, 2012, MOB held a 1.3 percent market share of the dollar amount of deposits in the AA ranking 14th among 24 FDIC insured financial institutions in the AA. By comparison, in 2011, the bank achieved a 5.2 percent market share by number of home refinance loans, ranking 5th among 158 reporting lenders and the bank achieved a 2.5 percent market share by number of home purchase loans, ranking 12th among 117 reporting lenders. MOB achieved a 0.3 percent market share by number of small loans to businesses. Home improvement and multifamily lending, combined, represented less than 3 percent of total HMDA-reportable lending and have little impact on the rating for the state of Nebraska. Considering the large volume of mortgage loans originated in the AA by megabanks, large regional banks, and mortgage companies, these market ranks/shares are considered excellent when compared to the deposit market rank/share. Many of the larger mortgage lenders do not take deposits in the AA, distorting the comparisons to deposit market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution of the bank's home mortgage and small business loans reflects good penetration throughout its Omaha and Lincoln AAs.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The bank's geographic distribution of home mortgage loans reflects good penetration throughout its Omaha and Lincoln AAs.

Omaha AA

The distribution of MOB's home mortgage loans within geographies of different income levels is good. The bank's home purchase and home refinance lending activity reflects good responsiveness.

The bank's percentage of lending for home purchases is slightly below the percentage of owner-occupied housing in low-income census tracts and below the percentage of owner-occupied housing in moderate-income census tracts. The bank's home purchase lending within both low- and moderate-income census tracts exceeds the 2011 HMDA aggregate. The bank's percentage of lending for home refinance is below the percentage of owner-occupied housing in low-income census tracts and is significantly below the percentage of owner-occupied housing in moderate-income census tracts. The bank's home refinance lending within low-income census tracts is above the 2011 HMDA aggregate but below the HMDA aggregate in moderate-income census tracts. The bank's percentage of lending for home improvement is slightly below the percentage of owner-occupied housing in low- and moderate-income census tracts but its home improvement lending within low- and moderate-income census tracts exceeds the 2011 HMDA aggregate.

In 2011, the bank's market share of both home purchase and home refinance lending in low-income and in moderate-income geographies is above its overall market share by respective loan product within the AA.

The bank also granted multifamily loans in this AA, but the volume of loans granted is insufficient to allow for meaningful analysis of such lending.

Lincoln AA

The distribution of home mortgage loans within geographies of different income levels is adequate. The bank's home purchase lending activity reflects good responsiveness, and home refinance lending activity reflects marginally adequate responsiveness. Home refinance lending receives more weight than home purchase lending because home refinance lending represents 83 percent of HMDA lending in the AA.

The bank's percentage of lending for home purchases exceeds the percentage of owner-occupied housing in low-income census tracts but is below the percentage of owner-occupied housing in moderate-income census tracts. The bank's home purchase lending within low-income census tracts exceeds the 2011 HMDA aggregate and is slightly below the HMDA aggregate in moderate-income census tracts. The bank's percentage of lending for home refinance is below the percentage of owner-occupied housing in low-income census tracts and is significantly below the percentage of owner-occupied housing in moderate-income census tracts. The bank's home refinance lending within low- and moderate-income census tracts is below the 2011 HMDA aggregate. The bank did not grant any home improvement loans in low- or moderate-income census tracts.

The bank's market share of home refinance loans granted in 2011 in low- and moderate-income geographies is below the bank's overall market share of home refinance loans within the AA. For home purchase loans, the bank's market share in low-income geographies exceeds its overall market share of home purchase loans in the AA, while its market share of loans within moderate-income geographies is slightly below its overall market share of home purchase loans within the AA.

The bank also granted multifamily loans in this AA, but the volume of loans granted in either product is insufficient to allow for meaningful analysis of such lending.

Small Loans to Businesses

Refer to Table 6 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Omaha AA

The distribution of small business loans within geographies of different income levels is good.

The bank's percentage of small business loans is slightly below the percentage of small businesses in low- and moderate-income geographies. The bank's small business lending within low- and moderate-income census tracts slightly exceeds the 2011 Small Business aggregate. In 2011, the bank's market share of small business loans in low-income geographies is slightly below its overall small business lending market share and slightly above its overall small business lending market share in moderate-income geographies within the AA.

Lincoln AA

The distribution of small business loans within geographies of different income levels is excellent due to its strong small business lending within low-income census tracts.

The bank's percentage of small business loans exceeds the percentage of small businesses in low-income census tracts but is slightly below the percentage of small businesses in moderate-income geographies. The bank's small business lending within low-income census tracts exceeds the 2011 Small Business aggregate and is slightly below the Small Business aggregate in moderate-income census tracts. In addition, the bank's market share of small business loans granted in 2011 in low-income census tracts exceeds its overall market share of small business loans, while its market share of small business loans in moderate-income geographies is slightly below its overall market share within the AA.

Lending Gap Analysis

Data detailing MOB'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

A high percentage of MOB's HMDA and CRA reportable loans were originated or purchased within its combined AAs. A majority (76.6 percent of the number and 66.4 percent of the dollar amount) of MOB's HMDA reportable loans were granted within the bank's combined AAs. For all CRA reportable small business loans granted during the evaluation period, MOB originated or purchased 83.1 percent by number, and 75.4 percent by dollar amount, within its combined AAs.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Omaha AA

The distribution of home mortgage loans to borrowers of different income levels is adequate. Home purchase and home refinance loans had adequate performance.

The bank's percentage of lending for home purchases is well below the percentage of low-income families but exceeds the percentage of moderate-income families in the AA. The bank's home purchase lending among low- and moderate-income borrowers is below the 2011 HMDA aggregate. The bank's percentage of lending for home refinance is well below the percentage of low- and moderate-income families in the AA. Further, the bank's home refinance lending among low- and moderate-income borrowers is well below the 2011 HMDA aggregate. The bank's percentage of lending for home improvement is significantly below the percentage of low-income families in the AA and is slightly below the percentage of moderate-income families. The bank's home improvement lending to low- and moderate-income borrowers is below the 2011 HMDA aggregate.

In 2011, the bank's market share of home refinance loans to low-income borrowers was below the bank's overall market share of home refinance lending within the AA, and its market share of loans to moderate-income borrowers is slightly below its overall market share. For home purchase loans, the market share of loans to low-income borrowers is below the bank's overall market share of home purchase loans within the AA, while loans to moderate-income borrowers is comparable to its overall market share.

Lincoln AA

The distribution of home mortgage loans to borrowers of different income levels is adequate. Home purchase and home refinance loans had adequate performance.

The bank's percentage of lending for home purchase is below the percentage of low-income families but exceeds the percentage of moderate-income families in the AA. The bank's home purchase lending among low- and moderate-income borrowers is below the 2011 HMDA aggregate. The bank's percentage of lending for home refinance is below the percentage of low- and moderate-income families in the AA. The bank's home refinance lending among low- and moderate-income borrowers is slightly below the 2011 HMDA aggregate. The bank's percentage of lending for home improvement is below the percentage of low- and moderate-income families. The bank's home improvement lending to low- and moderate-income borrowers is also below the 2011 HMDA aggregate.

In 2011, the bank's market share of home refinance loans to both low- and moderate-income borrowers was slightly below the bank's overall market share of home refinance lending within the AA. For home purchase loans, the market share of loans to low-income borrowers is below the bank's overall market share of home purchase loans within the AA and loans to moderate-income borrowers is slightly below its overall market share.

Small Loans to Businesses

Refer to Table 11 in the state of Nebraska section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Omaha AA

The distribution of small business loans to businesses of different income levels is adequate.

The bank's percentage of loans to very small businesses is below the percentage of very small businesses (businesses with revenues of \$1 million or less) in the AA. The bank's lending to very small businesses is slightly below the 2011 Small Business aggregate. The bank's market share of small business loans to very small businesses is slightly above its overall market share of such lending within the AA.

Lincoln AA

The distribution of small business loans to businesses of different income levels is adequate.

The bank's percentage of loans to very small businesses is below the percentage of very small businesses (businesses with revenues of \$1 million or less) in the AA. The bank's lending to very small businesses, however, exceeds the 2011 Small Business aggregate. The bank's market share of small business loans to very small businesses is comparable to its overall market share of such lending within the AA.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Nebraska section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. However, Table 5 does not separately list CD loans.

Community development lending has a positive impact on lending performance in both the Omaha and Lincoln AAs. During the evaluation period, MOB originated eight CD loans totaling \$61 million for affordable housing developments and projects that served to revitalize and stabilize low- and moderate-income communities in the combined AAs. Six of these loans are considered complex and all are considered responsive to community development needs.

In Omaha, the bank made four CD loans totaling \$54 million. One loan was a 48-unit apartment building providing affordable housing to low- and moderate-income tenants, two loans were part of a major revitalization effort in "Midtown" Omaha, and one loan was for the demolition of a blighted building and the construction of a multi-use development that included affordable housing and retail space.

In the Lincoln AA, the bank also made four CD loans totaling \$7 million. All loans were granted to the same developer to construct 290-units of affordable housing in a low-income census tract.

Product Innovation and Flexibility

MOB developed the Community First Home Loan Product to offer alternative financing for first-time homebuyers and individuals with limited credit history. The program offers up to 100 percent financing and does not require the borrower to purchase private mortgage insurance. While the program does not have a maximum income limitation for qualifying, the program has generated over \$15 million in loans and has assisted over 120 low- or moderate-income families nationwide.

INVESTMENT TEST

Conclusions for Areas Receiving Full Scope Reviews

The bank's performance under the investment test in Nebraska is rated "Low Satisfactory". Based on full scope reviews, the bank's performance is adequate in the Omaha AA and poor in the Lincoln AA.

During the evaluation period, the bank made 44 investments and donations in the Omaha AA totaling \$2.7 million. This investment activity represents approximately 1 percent of allocated tier one capital and represents adequate performance based on their responsiveness to low- and moderate-income individuals. In terms of total dollar amount, 70 percent of the bank's investments in the Omaha AA

were made to organizations focused on affordable housing. This includes an innovative \$1.4 million investment in a 26-unit Low Income Housing Tax Credit development. The remaining investments and donations in this AA went to organizations that provide community services targeted to low- and moderate-income individuals (\$671,000) and affordable housing (\$150,000).

During the evaluation period, the bank did not make any qualifying investments or donations in the Lincoln AA. We considered the limited opportunities for CD investments within the AA and also considered broader regional investments in the Investment Test rating for the Lincoln AA. Given the level of deposits attributable to the Lincoln AA compared to the Omaha AA, the investment test rating in the Lincoln AA does not materially impact the bank's overall investment test rating for the state of Nebraska.

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

SERVICE TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the Service Test in Nebraska is rated "High Satisfactory". Based on a full scope review, the bank's performance in the Omaha AA is good.

Retail Banking Services

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

Service delivery systems are accessible to geographies and individuals of different income levels in the AA. This is based on the good distribution of branches and ATMs in the Omaha and Lincoln AAs.

Omaha AA

The bank operates one branch in a moderate-income census tract in the Omaha AA. The percentage of MOB branches in moderate-income census tracts (20 percent) is slightly below the percentage of the population (26 percent) that lives in these geographies. In the Omaha AA, each branch has an ATM and the bank maintains an additional five ATMs in moderate-income census tracts. The bank's ATMs in moderate-income census tracts represents 60 percent of total ATMs in the AA. This provides excellent ATM access to low- and moderate-income individuals. There are no branches or ATMs in low-income census tracts. However, the low-income areas only represent a small percentage (4 percent) of the population in this AA.

During the evaluation period, the bank opened one branch in an upper-income census tract. The bank did not close any branches. While the branch opening slightly hurt the bank's overall distribution of branches in low- and moderate-income geographies, the bank's record of opening and closing branches does not adversely affect accessibility of bank products and services, particularly to low- and moderate-income individuals or geographies.

Lincoln AA

The bank operates one branch in a moderate-income census tract in the Lincoln AA. The percentage of MOB branches in moderate-income census tracts (50 percent) exceeds the percentage of the population (25 percent) that lives in these geographies. The bank maintains one ATM in the Lincoln AA and it is located at the bank's moderate-income branch. There are no branches or ATMs in low-income census tracts. However, the low-income areas only represent a small percentage (3 percent) of the population in this AA.

During the evaluation period, the bank did not open or close any branches. The bank's record of opening and closing branches does not adversely affect accessibility of bank products and services, particularly to low- and moderate-income individuals or geographies.

Omaha and Lincoln AAs

The bank's 24-hour ATM network offers an excellent system for delivering retail banking services in low- and moderate-income geographies. Alternative delivery systems are consistent across the whole bank. Alternative delivery systems include 24-hour telephone banking and Internet banking services. Banking representatives are available during business hours to help customers. Customers are able to obtain deposit and loan product information, pay bills electronically, and transfer funds from the bank website.

Banking hours and services do not vary significantly at the different branches. They are tailored to meet the needs of each community. Lobby and drive-up hours for branches located in low- and moderate-income geographies are similar to those offered in other geographies. Full-service banking is offered during regular business hours at all locations.

Community Development Services

In the Omaha AA, the bank provided an adequate and responsive level of CD services to qualified CD organizations during this evaluation period. The bank provided ten services that qualified as CD services to various organizations in the community. Most of the services were financial literacy education targeted to low- and moderate-income individuals and were responsive to the needs of the local area. In an innovative approach to helping the community, three bank staff members provided financial literacy education as part of a program to assist and mentor foster children who "age-out" of the system at age 18, often with little or no financial or social support. A bank staff member also served

on the board of a local organization that services the community in a variety of ways, including financial support and job training. The services provided by bank staff were financial in nature and within the expertise of staff providing the service.

In the Lincoln AA, the bank provided an adequate and responsive level of CD services to qualified CD organizations during this evaluation period. The bank provided four services that qualified as CD services to various organizations in the community. Most of the services were financial literacy education targeted to low- and moderate-income individuals and were responsive to the needs of the local area. A bank staff member also served on the board of a local affordable housing organization. The services provided by bank staff were financial in nature and within the expertise of staff providing the service.

State of Arizona

CRA Rating for Arizona:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- MOB's Low Satisfactory Lending Test rating is based on performance in Maricopa County. MOB demonstrates adequate lending activity, excellent geographic distributions, and adequate overall borrower income distributions. Community development lending also has a positive impact on the overall Lending Test performance.
- MOB's Outstanding Investment Test rating in Maricopa County is based on its significant level of investments in Maricopa County and its use of innovative or complex investments to meet community needs.
- MOB's Outstanding Service Test rating in Maricopa County is demonstrated by excellent accessibility of its delivery systems to individuals and geographies of different income levels, hours of operation and ATM distributions tailored to the needs of the community, and a significant level of community development services.

Description of Institution's Operations in Arizona

The bank has delineated the whole counties in which it maintains branches as its assessment area. Based on its branch network in the state of Arizona and metropolitan boundaries, the bank has three AAs in Arizona. These AAs are Maricopa County, Mohave County, and Pima County. As of June 30, 2012, total deposits held in its Arizona branches were \$657 million. The bank originated 857 home mortgage and small business loans totaling \$233 million in its combined Arizona AAs during the evaluation period. Deposits in Maricopa County branches totaled \$530 million, or 81 percent of deposits held in its Arizona branches. Lending in Maricopa County represented the majority (85 percent) of total loans granted within the combined Arizona AAs. For purposes of this evaluation, we performed a full scope review of the bank's performance in Maricopa County and limited reviews of Mohave and Pima Counties.

The bank entered Arizona through the acquisition of failed First National Bank of Nevada (FNBN) and its affiliate First Heritage Bank in July 2008. Prior to this acquisition, the former management team operated a subprime lending program. MOB ceased all lending operations as subprime lending was not a product that the bank offered. As such, MOB had to develop a new strategy for lending in Arizona and rebuild its lending operations.

Refer to the Market Profile for the state of Arizona in Appendix C for detailed demographics and other performance context information for the assessment area that received a full scope review.

Scope of Evaluation in Arizona

We performed a full scope review of CRA performance in the Maricopa County AA. With 28 percent of total retail deposits by dollar volume, Arizona branches combined hold the largest proportion of total retail deposits by state. Although only nine percent of total reportable lending was granted in its combined AAs in Arizona, lending in Arizona represents the second highest volume, by number, of loans granted by the bank within the states it maintains deposit operations. Given its deposit base, performance in the state of Arizona carries significant weight in the overall performance rating.

When determining conclusions for the Lending Test, we weighted loan products by number of loans over the evaluation period. During the evaluation period, home mortgage loans represented 79 percent of total reported loans in the combined AAs, while small loans to businesses represented 21 percent of the total. Among HMDA loan categories, home purchase, home refinance, home improvement, and multifamily loans represented 62.8 percent, 32.5 percent, 3.8 percent and 0.9 percent of total HMDA reported loans, respectively. The bank did not report any small loans to farms. In Maricopa County, we weighted home mortgage products (HMDA-reportable loans) more heavily than small loans to businesses.

We contacted three local economic development organizations serving Maricopa County. The contacts indicated that the majority of the local financial institutions do a good job with community reinvestment. Local institutions are trying to help through leveraging certain projects. There is a need for more lending to low- and moderate-income individuals, especially immigrants with limited education and disadvantaged by language barriers.

The data in the tables in Appendix D includes all reportable loans within the bank's AAs. This includes originations and purchases of residential mortgage loans and originations of loans targeted to businesses. When evaluating the geographic and borrower distribution of home mortgage loans and small loans to businesses within the AAs, we emphasized the distribution of loan originations from products targeted to the local AA. The bank primarily used these products to help meet community credit needs.

LENDING TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the Lending Test in Arizona is rated "Low Satisfactory". Based on a full scope review, the bank's performance in the Maricopa County AA is adequate.

Lending Activity

Refer to Table 1 Lending Volume in the state of Arizona section of Appendix D for the facts and data used to evaluate the bank's lending activity.

MOB's lending activity in Maricopa County reflects adequate responsiveness to AA credit needs. While deposits held by the bank in Arizona represent a significant proportion of its retail deposits bank-wide, MOB has a moderate presence in Maricopa County based on its lending and deposits compared to competing financial institutions in the AA. In 2011, MOB ranked 53rd out of 699 HMDA-reporters lending in Maricopa County and achieved a 0.27 percent market share of all HMDA lending. By comparison, MOB ranked 14th out of 62 financial institutions with branch operations in Maricopa County with 0.86 percent deposit market share as of June 30, 2012 according to the FDIC's summary of deposits.

Over the evaluation period, MOB originated or purchased 576 reportable home mortgage loans totaling \$158 million, 152 reportable small business loans totaling \$39 million, and 5 CD loans totaling \$15 million in Maricopa County. In Maricopa County, home mortgage loans represent the majority of the bank's reportable lending activity at approximately 80 percent of total reportable loans by both number and dollar volume. As a percent of mortgage loans, home purchase loans represents 62.8 percent of total mortgage loans, home refinance represents 32.5 percent, home improvement loans represent 3.8 percent, and multifamily loans represent less than 1 percent. Small business loans granted by MOB in the AA represent 20 percent of its reportable loans by both number and dollar volume. Based on deposits held in area branches as of June 30, 2012, MOB's local reportable loan-to-local deposit ratio is 37 percent, reflecting an adequate level of lending in the AA.

By loan product in the AA in 2011, the bank achieved a 0.3 percent market share by number of home purchase loans, ranking 52nd among 538 reporting lenders and the bank achieved a 0.2 percent market share by number of home refinance loans, ranking 58th among 501 reporting lenders. MOB achieved a 0.1 percent market share by number of small loans to businesses. Home improvement and multifamily lending, combined, represented less than 4 percent of total HMDA-reportable lending and have little impact on the rating for the state of Arizona. Considering the large volume of mortgage loans originated in the AA by megabanks, large regional banks, and mortgage companies, these market ranks/shares are reasonable compared to the deposit market rank/share. Many of the larger mortgage lenders do not take deposits in the AA, distorting the comparisons to deposit market share.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the state of Arizona section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The distribution of home mortgage loans within geographies of different income levels is excellent. Home purchase loans had excellent performance while refinance loans are adequate. Home purchase loans represented the majority of the banks lending within Maricopa County and therefore, more weight is given to the bank's home purchase lending performance.

The bank's percentage of lending for home purchases significantly exceeds the percentage of owner-occupied housing in moderate-income census tracts and is slightly below the percentage of owner-occupied housing in low-income census tracts. In addition, the bank's home purchase lending within low- and moderate-income census tracts exceeds the 2011 HMDA aggregate. The bank's percentage of lending for home refinance is significantly below the percentage of owner-occupied housing in moderate-income census tracts, and the bank did not grant any home refinance loans in low-income census tracts. The bank's home refinance lending within low- and moderate-income census tracts is also below the 2011 HMDA aggregate.

In 2011, the bank's market share of home purchase loans within both low- and moderate-income geographies exceeds the bank's overall market share of home purchase loans in Maricopa County. For home refinance loans, the bank's market share of loans within low-income census tracts exceeds its overall market share of home refinance loans, while refinance loans in moderate-income geographies is below the bank's overall market share within the MSA.

The bank also granted home improvement loans and multifamily loans in this AA, but the volume of loans granted in either product is insufficient to allow for meaningful analysis of such lending.

Small Loans to Businesses

Refer to Table 6 in the state of Arizona section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The distribution of small business loans to businesses of different income levels is excellent.

The bank's percentage of small business loans significantly exceeds the percentage of small businesses in low-income census tracts and exceeds the percentage of small businesses in moderate-income geographies. In addition, the bank's small business lending within low- and moderate-income census tracts exceeded the 2011 Small Business aggregate. In addition, the bank's market share of small business loans in both low-income and moderate-income geographies exceeds its overall small business loan market share within Maricopa County in 2011.

Lending Gap Analysis

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

Inside/Outside Ratio

A high percentage of MOB's HMDA and CRA reportable loans were originated or purchased within its combined AAs. A majority (76.6 percent of the number and 66.4 percent of the dollar amount) of MOB's HMDA reportable loans were granted within the bank's combined AAs. For all CRA reportable small business loans granted during the evaluation period, MOB originated or purchased 83.1 percent by number, and 75.4 percent by dollar amount, within its combined AAs.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the state of Arizona section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to borrowers of different income levels is marginally adequate. Home purchase and home refinance loans had marginally adequate performance.

The bank's percentage of lending for both home purchase and home refinance is significantly below the percentage of low- and moderate-income families in the AA. Further, the bank's home purchase and home refinance lending among low- and moderate-income borrowers is well below the 2011 HMDA aggregate. In 2011, the bank's market share of home purchase and home refinance loans to both low-income and moderate-income borrowers is below the bank's overall home purchase and home refinance lending market share within Maricopa County.

MOB entered Arizona through its acquisition of a failed bank in 2008. The prior bank was a subprime lender and this type of lending is not offered by MOB. As such, the bank had to rebuild its lending program from product offerings to staff to referral partners. For purposes of this evaluation only, we consider the bank's borrower distribution to be marginally adequate given consideration of MOB's need to create a new lending strategy in Arizona coupled with the level of competition for residential mortgage lending and the specific economic challenges faced by lower income individuals in the AA.

The bank also granted home improvement loans in this AA, but the volume of loans granted is insufficient to allow for meaningful analysis of such lending.

Small Loans to Businesses

Refer to Table 11 in the state of Arizona section of Appendix D 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 small business loans to businesses of different income levels is marginally adequate.

The bank's percentage of loans to very small businesses is significantly below the percentage of very small businesses (businesses with revenues of \$1 million or less) in the AA. Further, the bank's lending to very small businesses is below the 2011 Small Business aggregate. In 2011, the bank's market share of small business loans to very small businesses is slightly below its overall small business loan market share within Maricopa County.

Given that Maricopa County, as well as its other AAs in the state of Arizona are new AAs to the bank since the last evaluation and the bank entered these markets via the acquisition of a failed bank, we recognize the bank's need to build its lending program in Arizona. As such, we consider the bank's lending to very small businesses to be marginally adequate as of this evaluation.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Arizona section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. However, Table 5 does not separately list CD loans.

Community development lending has a positive impact on lending performance in Maricopa County. During the evaluation period, MOB originated five CD loans totaling \$15 million for affordable housing and economic development. One of these loans, a 130-unit affordable housing project, is considered complex and one loan, a small business loan supporting permanent job growth, is considered responsive to community development needs. The remaining CD loans are loans to the same borrowing entity that supports economic development in low- and moderate-income areas and provides jobs.

Product Innovation and Flexibility

MOB developed the Community First Home Loan Product to offer alternative financing to first-time homebuyers and individuals with limited credit history. The program offers up to 100 percent financing and does not require the borrower to purchase private mortgage insurance. While the program does not have a maximum income limitation for qualifying, the program has generated over \$15 million in loans and has assisted over 120 low- or moderate-income families nationwide.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited scope reviews, the bank's performance under the Lending Test in the Mohave County and Pima County AAs is consistent with the bank's overall satisfactory performance under the Lending Test in the state of Arizona. In Pima County, the bank's performance is weaker than the bank's overall performance in the state due to much lower lending volume. Similar lending obstacles were faced by the bank in Maricopa County. In Mohave County, the lending volume was too low to analyze.

Performance in the limited scope AAs doesn't negatively impact overall performance under the Lending

Test. Refer to Tables 1 through 11 in the state of Arizona section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the investment test in Arizona is rated "Outstanding". Based on a full scope review, the bank's performance in the Maricopa AA is excellent.

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

During the evaluation period, the bank made seven investments in the Maricopa AA totaling \$14.6 million. This investment activity represents approximately 32 percent of allocated tier one capital. This level of investment represents excellent performance based on their responsiveness to credit needs of low- and moderate-income individuals.

The largest portion (69 percent) of these investments consisted of New Market Tax Credits, which support affordable housing for low- and moderate-income individuals. These investments are either innovative or complex initiatives to address community development needs in the Maricopa AA. The remaining investments consist of low-income housing tax credits and a donation to an organization that provides community services targeted to low- and moderate-income individuals.

Conclusions for Area Receiving Limited Scope Reviews

Based on limited scope reviews, the bank's performance under the Investment Test in Pima County is consistent with the overall "Outstanding" rating under the Investment Test in the state of Arizona, but performance in Mohave County is weaker than the overall "Outstanding" rating due primarily to the small volume of deposits in this AA. The negative impact is not enough to impair the overall "Outstanding" rating for the state of Arizona. Refer to Table 14 in the state of Arizona section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the Service Test in Arizona is rated "Outstanding". Based on a full scope review, the bank's performance in the Maricopa County AA is excellent.

Retail Banking Services

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

Service delivery systems are readily accessible to geographies and individuals of different income levels in the AA. This is based on the excellent distribution of branches and ATMs in the full scope Maricopa AA. The bank operates one branch in a low-income census tract and two branches in moderate-income census tracts. The percentage of branches in low-income census tracts (12 percent) is significantly above the percentage of the population that lives in these geographies (5 percent). The percentage of branches in moderate-income census tracts (25 percent) is slightly below the percentage of the population that lives in these geographies (29 percent). In the Maricopa AA, each branch has an ATM and the bank maintains one additional ATM in a moderate-income census tract.

The bank's 24-hour ATM network offers a reasonable system for delivering retail banking services in low- and moderate-income geographies. Alternative delivery systems are consistent across the whole bank. Alternative delivery systems include 24-hour telephone banking and Internet banking services. Banking representatives are available during business hours to help customers. Customers are able to obtain deposit and loan product information, pay bills electronically, and transfer funds from the bank website.

The bank did not open or close any branches in low-income census tracts. The bank opened one branch and closed one branch in the moderate-income and middle-income census tracts during this review period. In addition, the bank closed two branches in upper-income census tracts. Overall, the bank's record of opening and closing branches does not adversely affect accessibility of its delivery systems, particularly to low- and moderate-income individuals or geographies.

Banking hours and services do not vary significantly at the different branches. They are tailored to meet the needs of each community. Lobby and drive-up hours for branches located in low- and moderate-income geographies are similar to those offered in other geographies. Full-service banking is offered during regular business hours at all locations.

Community Development Services

The bank provided a significant number of CD services to qualified CD organizations during this evaluation period. MOB staff participated in 86 events or activities providing CD services to various organizations in the community. Four of the innovative services were in the form of Board or committee membership with an organization that offers financial services to low- and moderate-income individuals. All of the services are responsive to the needs of the local area and were primarily in the form of financial literacy education or homebuyer education. The services provided by the bank were financial in nature and within the expertise of staff providing the service.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited scope reviews, the bank's performance under the Service Test in the Pima County AA and Mohave County AA is consistent with the bank's overall "Outstanding" performance under the Service Test in Arizona. The branches in these AAs are located where the majority of the population resides. Refer to Table 15 in the state of Arizona section of Appendix D for the facts and data that support these conclusions.

State of Nevada

CRA Rating for Nevada:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- MOB's Low Satisfactory Lending Test rating is based on performance in Clark County. MOB demonstrates adequate lending activity, adequate geographic distributions, and adequate overall borrower income distributions. Community development lending has no impact on the overall Lending Test performance.
- MOB's High Satisfactory Investment Test rating in Clark County is based on its good level of investments in Clark County.
- MOB's High Satisfactory Service Test rating in Clark County is demonstrated by good accessibility of its delivery systems to individuals and geographies of different income levels, hours of operation and ATM distributions tailored to the needs of the community, and significant level of community development services.

Description of Institution's Operations in Nevada

The bank has delineated the whole counties in which it maintains branches as its AA. Based on its branch network in the state of Nevada and metropolitan boundaries, the bank has three AAs in Nevada. These AAs are the Carson City AA, Clark County, and Washoe County. As of June 30, 2012, total deposits held in its Nevada branches were \$447 million. The bank originated 404 home mortgage and small business loans totaling \$75 million in its combined Nevada AAs during the evaluation period. Deposits in Clark County branches totaled \$298 million, or 67 percent of deposits held in its Nevada branches. Lending in Clark County represented 37 percent of total loans granted within the combined Nevada AAs and lending in Washoe County represented 61 percent of total loans in Nevada AAs. While lending in Washoe County represented a significant proportion of its lending in the state, we focus our analysis based on the proportion of deposits. For purposes of this evaluation, we performed a full scope review of the bank's performance in Clark County and limited reviews of the Carson City AA and Washoe County.

The bank entered Nevada through the acquisition of failed First National Bank of Nevada (FNBN) and its affiliate First Heritage Bank in July 2008. Prior to this acquisition, the former management team operated a subprime lending program. MOB ceased all lending operations as subprime lending was not a product that the bank offered. As such, MOB had to develop a new strategy for lending in Nevada and rebuild its lending operations.

Refer to the Market Profile for the state of Nevada in Appendix C for detailed demographics and other performance context information for the AA that received a full scope review.

Scope of Evaluation in Nevada

We performed a full scope review of CRA performance in the Clark County AA. With 19 percent of total retail deposits by dollar volume, Nevada branches combined hold the 3rd largest proportion of total retail deposits by state. Lending in Nevada AAs represented only 4 percent of total reportable lending bank wide. Given its deposit base, however, performance in the state of Nevada carries moderate weight in the overall performance rating.

When determining conclusions for the Lending Test, we weighted loan products by number of loans over the evaluation period. In Clark County, we weighted home mortgage products (HMDA-reportable loans) and small loans to businesses equally. During the evaluation period, home mortgage loans represented 62 percent of total reported loans in the AA and small loans to businesses represented 38 percent of the total. While the majority of its reportable loans were home mortgage products, the percentage of loans by home purchase lending represented 31 percent of reportable lending, home refinance represented 27 percent, and small business represented 38 percent. Home improvement and multifamily lending are not significant loan products in Nevada. Among HMDA loan categories, home purchase, home refinance, home improvement, and multifamily loans represented 50.5 percent, 44.1 percent, 1.1 percent, and 4.3 percent of total HMDA reported loans, respectively. The bank did not report any small loans to farms.

We contacted a local organization that specializes in economic development and affordable housing. The community development organization stated there are plenty of opportunities to serve this community. The contact stated that local financial institution involvement is reasonable with some financial institutions being more responsive than others. The contact mentioned that some banks are bold and innovative with their approach to community development. Banks participate in local housing organizations' down payment and closing cost programs. The contact mentioned that opportunities exist in the form of grants or investments for operational or capital support in local organizations. The contact also felt that financial institutions could work harder to design bank products for low- and moderate-income individuals.

The data in the tables in Appendix D includes all reportable loans within the bank's AAs. This includes originations and purchases of residential mortgage loans and originations of loans targeted to businesses. When evaluating the geographic and borrower distribution of home mortgage loans and small loans to businesses within the AAs, we emphasized the distribution of loan originations from products targeted to the local AA. The bank primarily used these products to help meet community credit needs.

LENDING TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the Lending Test in Nevada is rated Low Satisfactory. Based on a full scope review, the bank's performance in the Clark County AA is adequate.

Lending Activity

Refer to Table 1 Lending Volume in the state of Nevada section of Appendix D for the facts and data used to evaluate the bank's lending activity.

MOB's lending activity in Clark County reflects adequate responsiveness to AA credit needs. While deposits held by the bank in Nevada represent a relatively high proportion of its retail deposits bank-wide, MOB has a modest presence in Clark County based on its lending and deposits compared to competing financial institutions in the AA. In 2011, MOB ranked 93rd out 373 HMDA-reporters lending in Clark County and achieved a 0.06 percent market share of all HMDA lending. By comparison, MOB ranked 12th out of 40 financial institutions with branch operations in Clark County with 0.8 percent deposit market share as of June 30, 2012 according to the FDIC's summary of deposits.

Over the evaluation period, MOB originated or purchased 93 reportable home mortgage loans totaling \$31 million and 57 reportable small business loans totaling \$12 million in Clark County. In Clark County, home mortgage loans represent the majority of the bank's reportable lending activity at approximately 62 percent of total reportable loans by number and 72 percent by dollar volume. As a percent of mortgage loans, home purchase loans represents 31.3 percent of total mortgage loans, home refinance represents 27.3 percent, home improvement loans represent 0.7 percent and multifamily loans represent 2.7 percent. Small business loans granted by MOB in the AA represent 38 percent of its reportable loans by number and 28 percent by dollar volume. Based on deposits held in area branches as of June 30, 2012, MOB's local reportable loan-to-local deposit ratio was 15 percent, reflecting a low level of lending in the AA.

In the AA by loan product, in 2011, the bank achieved a 0.04 percent market share by number of home purchase loans, ranking 103rd among 298 reporting lenders and the bank achieved a 0.13 percent market share by number of home refinance loans, ranking 64th among 266 reporting lenders. MOB achieved a 0.13 percent market share by number of small loans to businesses. Home improvement and multifamily lending, combined, represented less than 4 percent of total HMDA-reportable lending and have little impact on the rating for the state of Nevada. Considering the large volume of mortgage loans originated in the AA by megabanks, large regional banks, and mortgage companies, these market ranks/shares are reasonable compared to the deposit market rank/share. Many of the larger mortgage lenders do not take deposits in the AA, distorting the comparisons to deposit market share.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the state of Nevada section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The distribution of home mortgage loans within geographies of different income levels is adequate. Home purchase loans and home refinance loans had adequate performance.

The bank's percentage of lending for home purchase is below the percentage of owner-occupied housing in moderate-income census tracts and the bank did not grant any home purchase loans in low-income census tracts. The bank's home purchase lending within low- and moderate-income census tracts is below the 2011 HMDA aggregate but the aggregate is also well below area demographics. The bank's percentage of lending for home refinance is significantly below the percentage of owner-occupied housing in moderate-income census tracts and the bank did not grant any home refinance loans in low-income census tracts. The bank's home refinance lending within low- and moderate-income census tracts is slightly below the 2011 HMDA aggregate.

In 2011, the bank's market share of home refinance loans in low-income geographies is below its overall market share of home refinance loans within the AA, while its market share of home refinance loans in moderate-income geographies exceeds its overall market share. For home purchase loans, the bank's market share in low-income geographies is below its overall market share of home purchase loans but in moderate-income geographies, the bank's market share is comparable to its overall market share within the AA.

The bank also granted home improvement loans and multifamily loans in this AA, but the volume of loans granted in either product was insufficient to allow for meaningful analysis of such lending.

Small Loans to Businesses

Refer to Table 6 in the state of Nevada section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The distribution of small business loans within geographies of different income levels is adequate.

The bank's percentage of small business loans is below the percentage of small businesses in low- and moderate-income geographies. The bank's small business lending within low-income census tracts is below the 2011 Small Business aggregate but comparable to the Small Business aggregate in moderate-income census tracts. In 2011, the bank's market share of small business loans in low-income and moderate-income geographies is below the bank's overall market share of small business loans within the AA.

Lending Gap Analysis

Data detailing MOB'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

A high percentage of MOB's HMDA and CRA reportable loans were originated or purchased within its combined AAs. A majority (76.6 percent of the number and 66.4 percent of the dollar amount) of MOB's HMDA reportable loans were granted within the bank's combined AAs. For all CRA reportable small business loans granted during the evaluation period, MOB originated or purchased 83.1 percent by number, and 75.4 percent by dollar amount, within its combined AAs.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the state of Nevada section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to borrowers of different income levels is marginally adequate. Home purchase and home refinance loans had poor performance but this performance is mitigated by the bank's need to rebuild lending operations in the state of Nevada.

The bank's percentage of lending for both home purchase and home refinance is significantly below the percentage of low-income families in the AA but slightly below the percentage of moderate-income families. The bank's home purchase and home refinance lending among low- and moderate-income borrowers is below the 2011 HMDA aggregate.

In 2011, the bank's market share of home refinance loans to low-income borrowers is below its overall market share of home refinance loans in the AA, while its market share of loans to moderate-income borrowers is comparable to its overall market share. For home purchase loans, the bank's market share of loans to low- and moderate-income borrowers is below the bank's overall market share of home purchase loans within the AA.

MOB entered Nevada through its acquisition of a failed bank in 2008. The prior bank was a subprime lender and this type of lending was not offered by the MOB. As such, the bank had to rebuild its lending program from product offerings to staff to referral partners. For purposes of this evaluation only, we consider the bank's borrower distribution to be marginally adequate given consideration of MOB's need to create a new lending strategy in Nevada coupled with the level of competition for residential mortgage lending and the specific economic challenges faced by lower income individuals in the AA.

The bank also granted home improvement loans in this AA but the volume of loans granted is insufficient to allow for meaningful analysis of such lending.

Small Loans to Businesses

Refer to Table 11 in the state of Nevada section of Appendix D 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 small business loans to businesses of different income levels is marginally adequate.

The bank's percentage of loans to very small businesses is well below the percentage of very small businesses (businesses with revenues of \$1 million or less) in the AA. Further, the bank's lending to very small businesses is below the 2011 Small Business aggregate. In 2011, the bank's market share of small business loans to very small businesses is below the bank's overall market share of small business loans within the AA.

Given that Clark County and the other AAs in the state of Nevada are new AAs to the bank since the last evaluation and the bank entered these markets via the acquisition of a failed bank, we recognize the bank's need to build its lending program in Nevada. As such, we consider the bank's lending to very small businesses to be marginally adequate as of this evaluation.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Nevada section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. However, Table 5 does not separately list CD loans.

MOB did not grant any CD loans in any of its AAs in Nevada.

Product Innovation and Flexibility

MOB developed the Community First Home Loan Product to offer alternative financing to first-time homebuyers and individuals with limited credit history. The program offers up to 100 percent financing and does not require the borrower to purchase private mortgage insurance. While the program does not have a maximum income limitation for qualifying, the program has generated over \$15 million in loans and has assisted over 120 low- or moderate-income families nationwide.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited scope reviews, the bank's performance under the Lending Test in the Washoe County AA is consistent with the bank's overall Low Satisfactory performance under the Lending Test in Nevada. In the Washoe County AA, the bank's performance is similar to the bank's overall performance in the state. In the Carson City AA, the lending volume was too low to analyze.

Performance in the limited scope AAs does not negatively impact overall performance under the Lending Test. Refer to Tables 1 through 11 in the state of Nevada section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the investment test in Nevada is rated "High Satisfactory". Based on a full scope review, the bank's performance in the Clark County AA is good.

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

During the evaluation period, the bank made three investments totaling \$2 million in the Clark County AA. This investment represents approximately 7.6 percent of allocated tier one capital. This consists of an innovative investment to fund a high quality affordable housing, restricted-rent housing project in Laughlin, Nevada. This level of investment represents good performance based on the responsiveness to low- and moderate-income individuals.

Conclusions for Area Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in Washoe County is consistent with the overall "High Satisfactory" rating under the Investment Test in the state of Nevada but performance in the Carson City AA is weaker than the overall "Low Satisfactory" rating under the investment test. The negative impact is not enough to impair the bank's overall "High Satisfactory" rating in the State of Nevada. Refer to Table 14 in the State of Nevada section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the Service Test in Nevada is rated "High Satisfactory". Based on a full scope review, the bank's performance in the Clark County AA is good.

Retail Banking Services

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

Service delivery systems are accessible to geographies and individuals of different income levels in the AA. This is based on the good distribution of branches and ATMs in Clark County. The bank operates two branches in moderate-income census tracts. The percentage of branches in moderate-income census

tracts (40 percent) exceeds the percentage of the population that lives in these geographies (28 percent). In Clark County, each branch has an ATM and the bank maintains one additional ATM in a moderate-income census tract. As such, 50 percent of the bank's ATMs are located in moderate-income areas. This provides good ATM access to low- and moderate-income individuals. The bank does not operate any branches or ATMs in low-income census tracts; however, the low-income census tracts represent only a small percentage of the population (2 percent) in this AA.

The bank's 24-hour ATM network offers a good system for delivering retail banking services in low- and moderate-income geographies. Alternative delivery systems are consistent across the whole bank. Alternative delivery systems include 24-hour telephone banking and Internet banking services. Banking representatives are available during business hours to help customers. Customers are able to obtain deposit and loan product information, pay bills electronically, and transfer funds from the bank website.

During the evaluation period, the bank closed three branches and opened two branches. The net effect of the branch closings and openings is one fewer branches in the upper-income geographies. The number of branch locations in other income level geographies remained the same. The bank's record of opening and closing branches does not adversely affect accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals.

Banking hours and services do not vary significantly at the different branches. They are tailored to meet the needs of each community. Lobby and drive-up hours for branches located in low- and moderate-income geographies are similar to those offered in other geographies. Full-service banking is offered during regular business hours at all locations.

Community Development Services

The bank provided a significant number of CD services to qualified CD organizations during this evaluation period. The bank provided 16 services to various organizations in the community that qualified. Most of these services were financial literacy/money management education targeted to low- and moderate-income individuals. These services also included grant writing education for non-profits and financial managerial expertise through Board membership in a food bank. All of these services are responsive to community needs. These services were financial in nature and within the expertise of staff providing the service.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited scope reviews, the bank's performance under the Service Test in the Carson City AA and Washoe County AA is consistent with the bank's overall "High Satisfactory" performance under the Service Test in Nevada. The Carson City AA does not have any branches or ATMs in low- or moderate-income census tracts. However, the majority (67 percent) of the population lives in middle-income geographies, where the single Carson City branch and ATM are located. The Washoe County AA has two branches and two ATMs, which are located in moderate-income census tracts.

State of Colorado

CRA Rating for Colorado:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Needs to Improve

The major factors that support this rating include:

- MOB's Low Satisfactory Lending Test rating is based on performance in the Greater Denver AA. MOB demonstrates adequate lending activity, adequate geographic distributions, and marginally adequate overall borrower income distributions. Community development lending has no impact on the overall Lending Test performance.
- MOB's High Satisfactory Investment Test rating in the Greater Denver AA is based on its good level of investments.
- MOB's Needs to Improve Service Test rating in the Greater Denver AA is reflective of a poor branch network but reasonable accessibility via alternative delivery systems, negative impact of branch closures in low- and moderate-income areas, and limited level of community development services.

Description of Institution's Operations in Colorado

The bank has delineated the whole counties in which it maintains branches as its assessment area. Based on its branch network in the state of Colorado and metropolitan boundaries, the bank has two AAs in Colorado. These AAs are the Greater Denver (Clear Creek, Denver, Douglas, and Jefferson Counties) AA and the Boulder County AA. As of June 30, 2012, total deposits held in its Colorado branches were \$287 million. The bank originated 459 home mortgage and small business loans totaling \$150 million in its combined Colorado AAs during the evaluation period. Deposits in the Greater Denver AA branches totaled \$249 million, or 87 percent of deposits held in its Colorado branches. Lending in the Greater Denver AA represented the majority (84 percent) of total loans granted within the combined Colorado AAs. For purposes of this evaluation, we performed a full scope review of the bank's performance in the Greater Denver AA and a limited review of the Boulder County AA.

Refer to the Market Profile for the state of Colorado in Appendix C for detailed demographics and other performance context information for the AA that received a full scope review.

Scope of Evaluation in Colorado

We performed a full scope review of CRA performance in the Greater Denver AA. With 12 percent of total retail deposits by dollar volume, Colorado branches combined hold a moderate proportion of total retail deposits by state. Loans granted in the combined Colorado AAs represent 5 percent of the total number of reportable loans granted by the bank within the states it maintains deposit operations. Given

its deposit base, performance in the state of Colorado carries moderate weight in the overall performance rating.

When determining conclusions for the Lending Test, we weighted loan products by number of loans over the evaluation period. During the evaluation period, home mortgage loans represented 95 percent of total reported loans in the combined AAs, while small loans to businesses represented 5 percent of the total. In the Greater Denver AA, we weighted home mortgage products (HMDA-reportable loans) more heavily than small loans to businesses. Among HMDA loan categories; home refinance, home purchase, home improvement, and multifamily loans represented 76.6 percent, 21.6 percent, 1.6 percent, and 0.3 percent of total HMDA reported loans, respectively. The bank did not report any small loans to farms.

For this evaluation, we contacted two local affordable housing organizations. One contact indicated that opportunities for financial institutions include financial literacy and basic banking education, project financing, small business loans, and working capital loans for non-profit organizations to name a few. One contact mentioned that local financial institutions tend to focus on one niche like revitalization but are unwilling to participate in affordable housing initiatives. As such, affordable housing presents an opportunity for financial institutions. The contact also mentioned that brokerage firms do a better job than financial institutions of providing financing to low- and moderate-income individuals. Another contact mentioned that some financial institutions are active partners with local organizations for community development, while other institutions are unwilling to participate in some projects.

The data in the tables in Appendix D include all reportable loans within the bank's AAs. This includes originations and purchases of residential mortgage loans and originations of loans targeted to businesses. When evaluating the geographic and borrower distribution of home mortgage loans and small loans to businesses within the AAs, we emphasized the distribution of loan originations from products targeted to the local AA. The bank primarily used these products to help meet community credit needs.

LENDING TEST

The bank's performance under the Lending Test in Colorado is rated "Low Satisfactory". Based on a full scope review, the bank's performance in the Greater Denver AA is adequate.

Lending Activity

Refer to Table 1 Lending Volume in the state of Colorado section of Appendix D for the facts and data used to evaluate the bank's lending activity.

MOB's lending activity in the Greater Denver AA reflects adequate responsiveness to AA credit needs. MOB has a modest presence in the Greater Denver AA based on its lending and deposits compared to competing financial institutions in the AA. In 2011, MOB ranked 66th out 575 HMDA-reporters lending in the Greater Denver AA and achieved a 0.2 percent market share of all HMDA lending. By comparison, MOB ranked 20th out of 53 financial institutions with branch operations in the Greater

Denver AA with 0.6 percent deposit market share as of June 30, 2012 according to the FDIC's summary of deposits.

Over the evaluation period, MOB originated or purchased 380 reportable home mortgage loans totaling \$124 million and 16 reportable small business loans totaling \$2 million in the Greater Denver AA. In the AA, home mortgage loans represent the majority of the bank's reportable lending activity at 96 percent of total reportable loans by number and 98 percent by dollar volume. As a percent of mortgage loans, home refinance represents 76.6 percent of total mortgage loans, home purchase loans represents 21.6 percent, home improvement loans represent 1.6 percent, and multifamily loans represent 0.3 percent. Small business loans granted by MOB in the AA represent 4 percent of its reportable loans by number and 2 percent by dollar volume. Based on deposits held in area branches as of June 30, 2012, MOB's local reportable loan-to-local deposit ratio was 51 percent, reflecting an adequate level of lending in the AA.

By loan product in 2011, the bank achieved a 0.15 percent market share by number of home purchase loans, ranking 78th among 408 reporting lenders and the bank achieved a 0.24 percent market share by number of home refinance loans, ranking 59th among 479 reporting lenders. Market share data for small loans to businesses was not available. Home improvement and multifamily lending, combined, represented less than 3 percent of total HMDA-reportable lending and have little impact on the rating for the state of Colorado. Considering the large volume of mortgage loans originated in the AA by megabanks, large regional banks, and mortgage companies, these market ranks/shares are reasonable compared to the deposit market rank/share. Many of the larger mortgage lenders do not take deposits in the AA, distorting the comparisons to deposit market share.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the state of Colorado section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The distribution of home mortgage loans within geographies of different income levels is adequate. Home purchase loans had good performance while refinance loans are adequate. Since the most significant loan product of the bank in the Greater Denver AA is home refinance, this product carries the most weight for the AA.

The bank's percentage of lending for home purchases exceeds the percentage of owner-occupied housing in low-income census tracts but is below the percentage of owner-occupied housing in moderate-income census tracts. The bank's home purchase lending within low-income census tracts slightly exceeds the 2011 HMDA aggregate but its lending in moderate-income census tracts is below the HMDA aggregate. The bank's percentage of lending for home refinance is slightly below the percentage of owner-occupied housing in low-income census tracts and well below the percentage of

owner-occupied housing in moderate-income census tracts. The bank's home refinance lending within low- and moderate-income census tracts is also below the 2011 HMDA aggregate.

In 2011, the bank's market share of home refinance loans in low-income geographies is below its overall market share of home refinance loans within the AA, while its market share of home refinance loans in moderate-income geographies closer to, but still below its overall market share. For home purchase loans, the bank's market share in both low- and moderate-income geographies is below its overall market share of home purchase loans within the AA.

The bank also granted home improvement loans and multifamily loans in this AA, but the volume of loans granted in either product was insufficient to allow for meaningful analysis of such lending.

Small Loans to Businesses

Refer to Table 6 in the state of Colorado section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The volume of small business loans granted by the bank in this assessment area is too low to perform any meaningful analysis of this lending. The bank's percentage of small business loans is significantly below the percentage of small businesses in moderate-income census tracts and the bank did not grant any small business loans in low-income geographies. Small business lending results were not available for the 2011 Small Business aggregate. Small business loan market share was not available.

Lending Gap Analysis

Data detailing MOB'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

A high percentage of MOB's HMDA and CRA reportable loans were originated or purchased within its combined AAs. A majority (76.6 percent of the number and 66.4 percent of the dollar amount) of MOB's HMDA reportable loans were granted within the bank's combined AAs. For all CRA reportable small business loans granted during the evaluation period, MOB originated or purchased 83.1 percent by number, and 75.4 percent by dollar amount, within its combined AAs.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the state of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to borrowers of different income levels is marginally adequate given its performance context in Colorado. Home purchase and home refinance loans had adequate performance.

The bank's percentage of lending for home purchases is well below the percentage of low- and moderate-income families in the AA. Further, the bank's home purchase lending among low- and moderate-income borrowers is also well below the 2011 HMDA aggregate. The bank's percentage of lending for home refinance is well below the percentage of low- and moderate-income families in the AA. The bank's home refinance lending among low-income borrowers was slightly below the 2011 HMDA aggregate and slightly above the HMDA aggregate for lending to moderate-income borrowers.

In 2011, the bank's market share of home refinance loans to low-income borrowers is below its overall market share of home refinance loans in the AA and its market share of loans to moderate-income borrowers is slightly below its overall market share. For home purchase loans, the bank's market share of loans to both low- and moderate-income borrowers is below the bank's overall market share of home purchase loans within the AA.

MOB entered Colorado through its acquisition of Peak National Bank in late 2010. This bank was primarily a commercial lender and this type of lending was not a major product offered by MOB. As such, the bank discontinued land development lending operations and had to develop a new lending operation, from product offerings to staff to referral partners. For purposes of this evaluation only, we consider the bank's borrower distribution to be marginally adequate given MOB's need to create a new lending strategy in Colorado coupled with the level of competition for residential mortgage lending.

The bank also granted home improvement loans in this AA but the volume of loans granted is insufficient to allow for meaningful analysis of such lending.

Small Loans to Businesses

Refer to Table 11 in the state of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The volume of small business loans granted by the bank in this AA is too low to perform any meaningful analysis of this lending. The bank's percentage of loans to very small businesses is below the percentage of very small businesses (businesses with revenues of \$1 million or less) in the AA. Small business lending results were not available for the 2011 Small Business aggregate. Small business market share data was not available.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Colorado section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic

lending data on all multifamily loans, including those that also qualify as CD loans. However, Table 5 does not separately list CD loans.

MOB did not grant any community development loans in any of its AAs in Colorado.

Product Innovation and Flexibility

MOB developed the Community First Home Loan Product to offer alternative financing to first-time homebuyers and individuals with limited credit history. The program offers up to 100 percent financing and does not require the borrower to purchase private mortgage insurance. While the program does not have a maximum income limitation for qualifying, the program has generated over \$15 million in loans and has assisted over 120 low- or moderate-income families nationwide.

Conclusions for Area Receiving Limited Scope Review

Based on limited scope reviews, the bank’s performance under the Lending Test in Boulder County is consistent with the bank’s overall Satisfactory performance under the Lending Test in the state of Colorado. In Boulder County, the bank’s performance is weaker than the bank’s overall performance in the state due to much lower lending volume. Similar lending obstacles were faced by the bank in the Greater Denver AA. Performance in the limited scope AA doesn’t negatively impact overall performance under the Lending Test. Refer to Tables 1 through 11 in the state of Colorado section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Area Receiving Full Scope Review

The bank’s performance under the investment test in Colorado is rated “High Satisfactory”. Based on a full scope review, the bank’s performance in the Greater Denver AA is good.

Refer to Table 14 in the state of Colorado section of Appendix D for the facts and data used to evaluate the bank’s level of qualified investments.

During the evaluation period, the bank made two investments in the Greater Denver AA totaling \$2.8 million or 7.7 percent of allocated tier one capital. This investment consisted of mortgage backed securities, which support affordable housing for low- and moderate-income individuals.

Conclusions for Area Receiving Limited Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in Boulder County is consistent with the overall “High Satisfactory” rating under the Investment Test in the state of Colorado. Refer to Table 14 in the State of Colorado section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the Service Test in Colorado is rated "Needs to Improve". Based on a full scope review, the bank's performance in the Greater Denver AA is poor.

Retail Banking Services

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

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA, but branch access is poor. This is based on the poor distribution of branches and ATMs in the full scope Greater Denver AA. The bank operates five branches in upper-income census tracts and one branch in a middle-income census tract. Each branch has an ATM. The bank does not operate any branches or ATMs in low- or moderate-income census tracts. Notwithstanding the lack of branches in low- or moderate-income census tracts, two of the branches are located in census tracts where at least 30 percent of the families are designated as low- or moderate-income. Further, as of the 2010 U.S. Census, the branch in the middle-income census tract has been re-designated as a moderate-income tract.

The bank's 24-hour ATM network offers a good system for delivering retail banking services. Alternative delivery systems are consistent across the whole bank. Alternative delivery systems include 24-hour telephone banking and Internet banking services. Banking representatives are available during business hours to help customers. Customers are able to obtain deposit and loan product information, pay bills electronically, and transfer funds from the bank website.

During the evaluation period, the bank opened one branch and closed one branch. The branch closing was in a moderate-income geography and the branch opening was in an upper-income geography. The bank's record of opening and closing branches adversely affects the accessibility of the bank's delivery systems, particularly to low- and moderate-income geographies and individuals.

Banking hours and services do not vary significantly at the different branches. Branch hours and services are tailored to meet the needs of each community. Lobby and drive-up hours for branches are similar within all geographies. Full-service banking is offered during regular business hours at all locations.

Community Development Services

The bank provided a limited number of CD services to qualified CD organizations during this evaluation period. The bank provided services to two community development organizations in the Greater Denver AA. These services were in the form of financial literacy and homeownership counseling for low- and

moderate-income individuals. These services are responsive to the needs of the local area. These services were financial in nature and within the expertise of staff providing the service.

Conclusions for Area Receiving Limited Scope Review

Based on a limited scope review, the bank’s performance under the Service Test in the Boulder County AA is consistent with the bank’s overall “Needs to Improve” performance under the Service Test in Colorado. In this AA, there are also no branches or ATMs in low- and moderate-income geographies. Refer to Table 15 in the state of Colorado section of Appendix D for the facts and data that support these conclusions.

State of Texas

CRA Rating for Texas:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- MOB's Low Satisfactory Lending Test rating is based on performance in Dallas County. MOB demonstrates good lending activity but marginally adequate distribution of its loans within low- and moderate-income geographies, and to low- and moderate-income borrowers. Community development lending has a positive impact on the overall Lending Test performance.
- MOB's High Satisfactory Investment Test rating in Dallas County is based on its good level of investments.
- MOB's Low Satisfactory Service Test rating in Dallas County is reflective of a poor branch network but reasonable accessibility via alternative delivery systems, hours of operation tailored to the needs of the community, and significant level of community development services.

Description of Institution's Operations in Texas

The bank has delineated the whole counties in which it maintains branches as its AA. Based on its branch network in the state of Texas and metropolitan boundaries, the bank has two AAs in Texas. These AAs are Dallas County and Harris County. As of June 30, 2012, total deposits held in its Texas branches were \$163 million. The bank originated 295 home mortgage and small business loans totaling \$183 million in its combined Texas AAs during the evaluation period. Deposits in Dallas County branches totaled \$107 million, or 65 percent of deposits held in its Texas branches. Lending in Dallas County represented the majority (56 percent) of total loans granted within the combined Texas AAs. For purposes of this evaluation, we performed a full scope review of the bank's performance in Dallas County and a limited review of Harris County.

Refer to the Market Profile for the state of Texas in Appendix C for detailed demographics and other performance context information for the AA that received a full scope review.

Scope of Evaluation in Texas

We performed a full scope review of CRA performance of the Dallas County AA. Retail deposits in Texas branches represent 7 percent of total retail deposits by dollar volume and lending in Texas AAs represented only 3 percent of total number of reportable lending bank wide. Given its deposit base, performance in Texas carries very little weight in the overall performance rating.

When determining conclusions for the Lending Test, we weighted loan products by number of loans over the evaluation period. In the Texas AA, home mortgage loans represented 80 percent of total reported loans in the AA and small loans to businesses represented 20 percent of the total. Among HMDA loan categories; home purchase, home refinance, multifamily, and home improvement loans represented 49.4 percent, 46.8 percent, 3.4 percent and 0.4 percent of total HMDA reported loans, respectively. The bank did not report any small loans to farms. In Dallas County, we weighted home mortgage products (HMDA-reportable loans) more heavily than small loans to businesses.

We contacted two local organizations that specialize in affordable housing and economic development. The affordable housing contact mentioned a lack of funding in the area for transit-oriented development projects. The contact expressed concern over the sheer number of foreclosures and that gives the impression that bank's are not working with the borrowers to avoid foreclosure. The economic development contact stated there are plenty of opportunities in the area, such as lending to low- and moderate-income individuals, investing in non-profit organizations and charities, and offering basic banking education. The contact said that financial institutions have demonstrated a willingness to work with the community. There is a good working relationship between the organizations and local financial institutions. However, the contact mentioned that financial institutions have shown a preference of working with organizations rather than directly with low- and moderate-income individuals. There is also a need for more branches in the area to provide more opportunity for new account opening and face-to-face interaction.

The data in the tables in Appendix D include all reportable loans within the bank's AAs. This includes originations and purchases of residential mortgage loans and originations of loans targeted to businesses. When evaluating the geographic and borrower distribution of home mortgage loans and small loans to businesses within the AAs, we emphasized the distribution of loan originations from products targeted to the local AA. The bank primarily used these products to help meet community credit needs.

LENDING TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the Lending Test in Texas is rated Low Satisfactory. Based on a full scope review, the bank's performance in the Dallas County AA is marginally adequate.

Lending Activity

Refer to Table 1 Lending Volume in the state of Texas section of Appendix D for the facts and data used to evaluate the bank's lending activity.

MOB's lending activity in Dallas County reflects good responsiveness to AA credit needs. MOB has a modest presence in Dallas County based on its lending and deposits compared to competing financial institutions in the AA. In 2011, MOB ranked 74th out of 613 HMDA reporters lending in Dallas County and achieved a 0.19 percent market share of all HMDA lending. By comparison, MOB ranked 53rd out

of 103 financial institutions with branch operations in Dallas County with 0.9 percent deposit market share as of June 30, 2012 according to the FDIC's summary of deposits.

Over the evaluation period, MOB originated or purchased 171 reportable home mortgage loans totaling \$94 million, 34 reportable small business loans totaling \$8 million, and 2 community development loans totaling \$3 million in Dallas County. In Dallas County, home mortgage loans represent the majority of the bank's reportable lending activity at approximately 83 percent of total reportable loans by number and 92 percent by dollar volume. As a percent of mortgage loans, home purchase loans represented 46.8 percent of total mortgage loans, home refinance represented 50.9 percent, home improvement loans represented 0.6 percent, and multifamily loans represented 1.8 percent. Small business loans granted by MOB in the AA represented 17 percent of its reportable loans by number and 8 percent by dollar volume. Based on deposits held in area branches as of June 30, 2012, MOB's local reportable loan-to-local deposit ratio is 96 percent, reflecting a strong level of lending in the AA.

In the AA by loan product in 2011, the bank achieved a 0.20 percent market share by number of home purchase loans, ranking 68th among 473 reporting lenders and the bank achieved a 0.18 percent market share by number of home refinance loans, ranking 61st among 463 reporting lenders. MOB achieved a 0.06 percent market share by number of small loans to businesses. Home improvement and multifamily lending, combined, represented less than 3 percent of total HMDA-reportable lending and have little impact on the rating for the state of Texas. Despite the large number of competitors, the bank's HMDA loan market ranks/shares are strong when compared to its deposit market rank/share.

Distribution of Loans by Income Level of the Geography

Overall, the distribution of the bank's loans within geographies of different income levels is marginally adequate.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The distribution of home mortgage loans within geographies of different income levels is poor. Home purchase loans and refinance loans had poor performance.

The bank's percentage of lending for home purchase is significantly below the percentage of owner-occupied housing in moderate-income census tracts, and the bank did not grant any home purchase loans in low-income census tracts. In addition, the bank's home purchase lending within low- and moderate-income census tracts is well below the 2011 HMDA aggregate. The bank's percentage of lending for home refinance is significantly below the percentage of owner-occupied housing in moderate-income census tracts, and the bank did not grant any home refinance loans in low-income census tracts. The bank's home refinance lending within low- and moderate-income census tracts is also below the 2011 HMDA aggregate.

In 2011, the bank's market share of home refinance loans in both low- and moderate-income geographies is below its overall market share of home refinance loans within the AA. For home purchase loans, the bank's market share in low-income geographies is comparable to its overall market share of home purchase loans but in moderate-income geographies, the bank's market share is below its overall market share within the AA. The market share data includes multifamily loans, and the bank granted one multifamily loan located in a low-income census tract.

The bank also granted home improvement loans and multifamily loans in this AA, but the volume of loans granted in either product was insufficient to allow for meaningful analysis of such lending.

Small Loans to Businesses

Refer to Table 6 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The distribution of small business loans within geographies of different income levels is good. The bank's percentage of small business loans significantly exceeds the percentage of small businesses in moderate-income census tracts, but the bank did not grant any small business loans in low-income geographies. The bank's small business lending within moderate-income census tracts far exceeds the 2011 Small Business aggregate. In 2011, the bank's market share of small business loans in low-income geographies is below the bank's overall market share of small business loans within the AA, while its market share of loans in moderate-income geographies exceeds its overall market share.

Lending Gap Analysis

Data detailing MOB'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

A high percentage of MOB's HMDA and CRA reportable loans were originated or purchased within its combined AAs. A majority (76.6 percent of the number and 66.4 percent of the dollar amount) of MOB's HMDA reportable loans were granted within the bank's combined AAs. For all CRA reportable small business loans granted during the evaluation period, MOB originated or purchased 83.1 percent by number, and 75.4 percent by dollar amount, within its combined AAs.

Distribution of Loans by Income Level of the Borrower

The distribution of the bank's loans to borrowers of different income levels is marginally adequate.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to borrowers of different income levels is poor. Home purchase and home refinance loans had poor performance.

The bank's percentage of lending for both home purchase and home refinance is significantly below the percentage of low- and moderate-income families in the AA. Further, the bank's home purchase and home refinance lending among low- and moderate-income borrowers is well below the 2011 HMDA aggregate.

In 2011, the bank's market share of home refinance loans and home purchase loans to both low-income and moderate-income borrowers is below its overall market share of the respective loan products in the AA.

The bank also granted home improvement loans in this AA, but the volume of loans granted is insufficient to allow for meaningful analysis of such lending.

Small Loans to Businesses

Refer to Table 11 in the state of Texas section of Appendix D 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 small business loans to businesses of different income levels is good. The bank's percentage of small business loans is below the percentage of very small businesses (businesses with revenues of \$1 million or less) in the AA. The bank's lending to very small businesses is slightly above the 2011 Small Business aggregate. In 2011, the bank's market share of small business loans to very small businesses is comparable to its overall market share of small business loans within the AA.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Texas section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. However, Table 5 does not separately list CD loans.

Community development lending has a positive impact on lending performance in Dallas County. During the evaluation period, MOB originated two CD loans totaling \$3 million for affordable housing. These loans are considered responsive and provide 143 affordable housing units.

Product Innovation and Flexibility

MOB developed the Community First Home Loan Product to offer alternative financing to first-time homebuyers and individuals with limited credit history. The program offers up to 100 percent financing

and does not require the borrower to purchase private mortgage insurance. While the program does not have a maximum income limitation for qualifying, the program has generated over \$15 million in loans and has assisted over 120 low- or moderate-income families nationwide.

Conclusions for Area Receiving Limited Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in Harris County is consistent with the bank's overall low satisfactory performance under the Lending Test in Texas. In Harris County, the bank's performance is generally comparable to the bank's overall performance in the state. Performance in the limited scope AA doesn't negatively impact overall performance under the Lending Test. Refer to Tables 1 through 11 in the state of Texas section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the investment test in Texas is rated "High Satisfactory". Based on a full scope review, the bank's performance in the Dallas County AA is good.

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

During the evaluation period, the bank made one investment totaling \$744,000. This investment represents 8.1 percent of allocated tier one capital. This investment consists of mortgage backed securities which support affordable housing for LMI individuals.

Conclusions for Area Receiving Limited Scope Review

Based on a limited scope review, the bank's performance under the Investment Test in the Harris County AA is consistent with the overall "High Satisfactory" rating under the Investment Test in the state of Texas. Refer to Table 14 in the state of Texas section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the Service Test in Texas is rated "Low Satisfactory". Based on a full scope review, the bank's performance in the Dallas County AA is adequate.

Retail Banking Services

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

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA but branch access is poor. This is based on the poor distribution of branches and ATMs in the full scope Dallas County AA. The bank operates two branches in the AA and both are located in upper-income census tracts. Each branch has an ATM. Based on the population distribution in the AA, only 21 percent of the population lives in upper-income census tracts.

Alternative delivery systems are consistent across the whole bank. Alternative delivery systems include 24-hour telephone banking and Internet banking services. Banking representatives are available during business hours to help customers. Customers are able to obtain deposit and loan product information, pay bills electronically, and transfer funds from the bank website.

During the evaluation period, there were no branch closings and two branch openings. The branches were opened organically and are the only branches in the AA. The bank's record of opening and closing branches has not negatively nor positively affected accessibility of its delivery systems, particularly to low- and moderate-income level individuals and areas.

Banking hours and services do not vary significantly at the different branches. Branch hours and services are tailored to meet the needs of each community. Lobby and drive-up hours for branches are similar within all geographies. Full-service banking is offered during regular business hours at all locations.

Community Development Services

The bank provided a significant number of CD services to qualified CD organizations during this evaluation period. MOB staff participated in fifty events or activities providing CD services to various organizations in the community. All of the bank's CD services were in the form of financial literacy. All of the services are responsive. Twelve of the services are considered complex as the services included the development of a savings program in addition to financial literacy and basic banking education. These services were financial in nature and within the expertise of staff providing the service.

Conclusions for Area Receiving Limited Scope Review

Based on a limited scope review, the bank's performance under the Service Test in the Harris County AA is consistent with the bank's overall "Low Satisfactory" performance under the Service Test in Texas. The Harris County AA branch distribution is identical to the Dallas County AA distribution. Both branches and ATMs are located in upper-income census tracts. Another similarity is that both of the limited scope AA branches were also organically opened during the evaluation period for this examination. The bank provided a high level of community development services in Harris County.

State of Florida

CRA Rating for Florida:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- MOB's Low Satisfactory Lending Test rating is based on performance in Collier County. MOB demonstrates excellent lending activity but marginally adequate distribution of its loans within low- and moderate-income geographies, and to low- and moderate-income borrowers. Community development lending has a positive impact on the overall Lending Test performance.
- MOB's Low Satisfactory Investment Test rating in Collier County is based on its adequate level of investments.
- MOB's Low Satisfactory Service Test rating in Collier County is reflective of an adequate branch network and reasonable accessibility via alternative delivery systems, hours of operation tailored to the needs of the community, and a limited level of community development services.

Description of Institution's Operations in Florida

The bank has delineated the whole counties in which it maintains branches as its AA. Based on its branch network in the state of Florida and metropolitan boundaries, the bank has two AAs in Florida. These AAs are Collier County and Hillsborough County. As of June 30, 2012, total deposits held in its Florida branches were \$127 million. The bank originated 528 home mortgage and small business loans totaling \$254 million in its combined Florida AAs during the evaluation period. Deposits in Collier County branches totaled \$112 million, or 89 percent of deposits held in its Florida branches. Lending in Collier County represented the majority (95 percent) of total loans granted within the combined Florida AAs. For purposes of this evaluation, we performed a full scope review of the bank's performance in Collier County and a limited review of Hillsborough County.

Refer to the Market Profile for the state of Florida in Appendix C for detailed demographics and other performance context information for the assessment area that received a full scope review.

Scope of Evaluation in Florida

We performed a full scope review of CRA performance of the Collier County AA. Retail deposits in Florida branches represent 5 percent of total retail deposits by dollar volume and lending in Florida AAs represented 5 percent of the total number of reportable lending bank wide. Given its deposit base, performance in Florida carries very little weight in the overall performance rating.

When determining conclusions for the Lending Test, we weighted loan products by number of loans over the evaluation period. In the Florida AAs, home mortgage loans represented 96 percent of total reported loans in the combined AAs and small loans to businesses represented 4 percent of the total. Among HMDA loan categories, home purchase and home refinance loans represented 66.1 percent and 33.9 percent of total HMDA reported loans, respectively. The bank did not report any home improvement or multifamily loans. The bank also did not report any small loans to farms. In Collier County, we weighted home mortgage products (HMDA-reportable loans) more heavily than small loans to businesses.

We contacted two local affordable housing organizations. The contacts stated that opportunities for financial institutions are present. Some of those opportunities are homebuyer education programs, board or committee memberships, or just to give a borrower that lost a job during the recession another chance. One contact mentioned the smaller financial institutions in the area are easier to work with than the larger institutions. Another contact stated that some local financial institutions have a history of community development participation while others do not. This contact would like to see increased local institution participation.

The data in the tables in Appendix D includes all reportable loans within the bank's AAs. This includes originations and purchases of residential mortgage loans and originations of loans targeted to businesses. When evaluating the geographic and borrower distribution of home mortgage loans and small loans to businesses within the AAs, we emphasized the distribution of loan originations from products targeted to the local AA. The bank primarily used these products to help meet community credit needs.

LENDING TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the Lending Test in Florida is rated "Low Satisfactory". Based on a full scope review, the bank's performance in the Collier County AA is marginally adequate.

Lending Activity

Refer to Table 1 Lending Volume in the state of Florida section of Appendix D for the facts and data used to evaluate the bank's lending activity.

MOB's lending activity in Collier County reflects excellent responsiveness to AA credit needs. While deposits held by the bank in Florida represents a low proportion of its retail deposits bank wide, MOB has a relatively strong presence in Collier County based on its lending and deposits compared to competing financial institutions in the AA. In 2011, MOB ranked 6th out of 443 HMDA reporters lending in Collier County and achieved a 3 percent market share of all HMDA lending. By comparison, MOB ranked 19th out of 39 financial institutions with branch operations in Collier County with 1 percent deposit market share as of June 30, 2012 according to the FDIC's summary of deposits.

Over the evaluation period, MOB originated or purchased 489 reportable home mortgage loans totaling \$239 million and 17 reportable small business loans totaling \$3 million in Collier County. In the AA, home mortgage loans represent the majority of the bank's reportable lending activity at 97 percent of total reportable loans by number and 99 percent by dollar volume. As a percent of mortgage loans, home purchase loans represent 67 percent of total mortgage loans and home refinance loans represent 33 percent. Small business loans granted by MOB in the AA represent 3 percent of its reportable loans by number and 1 percent by dollar volume. Based on deposits held in area branches as of June 30, 2012, MOB's local reportable loan-to-local deposit ratio is 216 percent, reflecting an excellent level of lending in the AA.

In the AA by loan product in 2011, the bank achieved a 3.7 percent market share by number of home purchase loans, ranking 6th among 325 reporting lenders and the bank achieved a 2.2 percent market share by number of home refinance loans, ranking 8th among 289 reporting lenders. MOB achieved a 0.2 percent market share by number of small loans to businesses. The bank did not grant any home improvement or multifamily loans in the AA. Despite the large volume of mortgage lenders in the AA, the bank maintains a strong market presence in Collier County.

Distribution of Loans by Income Level of the Geography

The distribution of the bank's loans within geographies of different income levels is marginally adequate.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the state of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The distribution of home mortgage loans within geographies of different income levels is poor. Home purchase loans and refinance loans had poor performance. The bank's poor performance of lending within low- and moderate-income geographies is somewhat mitigated by the fact that the bank did not establish branch operations in Collier County until January 2010.

The bank's percentage of lending for home purchase is below the percentage of owner-occupied housing in moderate-income census tracts and the bank did not grant any loans in low-income census tracts. The bank's home purchase lending within low- and moderate-income census tracts is below the 2011 HMDA aggregate. The bank's percentage of lending for home refinance is well below the percentage of owner-occupied housing in moderate-income census tracts and the bank did not grant any home refinance loans in low-income census tracts. The bank's home refinance lending within low- and moderate-income census tracts is also below the 2011 HMDA aggregate.

In 2011, the bank's market share of home refinance loans in moderate-income geographies is well below the bank's overall market share within the AA. For home purchase loans, the market share in moderate-income geographies is slightly below the bank's overall market share within the AA. The bank did not grant any residential mortgage loans in low-income geographies.

The bank did not grant any home improvement loans and multifamily loans in this AA.

Small Loans to Businesses

Refer to Table 6 in the state of Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Despite the low volume of small loans to businesses overall, the distribution of small business loans within geographies of different income levels is good. The bank's percentage of small business loans exceeds the percentage of small businesses in moderate-income census tracts, but the bank did not grant any small business loans in low-income geographies. The bank's small business lending within moderate-income census tracts exceeds the 2011 Small Business aggregate, but its lending is below the aggregate for lending in low-income census tracts. In 2011, the bank's market share of small business loans in moderate-income geographies is above its overall market share within the AA.

Lending Gap Analysis

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

Inside/Outside Ratio

A high percentage of MOB's HMDA and CRA reportable loans were originated or purchased within its combined AAs. A majority (76.6 percent of the number and 66.4 percent of the dollar amount) of MOB's HMDA reportable loans were granted within the bank's combined AAs. For all CRA reportable small business loans granted during the evaluation period, MOB originated or purchased 83.1 percent by number, and 75.4 percent by dollar amount, within its combined AAs.

Distribution of Loans by Income Level of the Borrower

The distribution of the bank's loans to borrowers of different income levels is marginally adequate.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the state of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to borrowers of different income levels is poor. Home purchase and home refinance loans had poor performance. The bank's poor performance of lending to low- and moderate-income borrowers is somewhat mitigated by the fact that the bank did not establish branch operations in Collier County until January 2010.

The bank's percentage of lending for both home purchase and home refinance is significantly below the percentage of low- and moderate-income families in the AA. The bank's home purchase lending among low- and moderate-income borrowers is well below the 2011 HMDA aggregate. The bank's home refinance lending among low-income borrowers is slightly below the 2011 HMDA aggregate and lending among moderate-income borrowers is well below the aggregate.

In 2011, the bank's market share of home refinance loans to low-income and moderate-income borrowers is below the bank's overall market share of home refinance loans within the AA. For home purchase loans, the market share of loans to low-income and moderate-income borrowers is below the bank's overall market share of home refinance loans within the AA.

The bank did not grant any home improvement loans in this AA.

Small Loans to Businesses

Refer to Table 11 in the state of Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The volume of small business loans granted by the bank in this assessment area is relatively low. The distribution of small business loans to businesses of different income levels is good. The bank's percentage of small business loans is below the percentage of very small businesses (businesses with revenues of \$1 million or less) in the AA. However, the bank's lending to very small businesses is slightly above the 2011 Small Business aggregate. In 2011, the bank's market share of small business loans to very small businesses is slightly above the bank's overall market share within the AA.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Florida section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending has a positive impact on lending performance in Hillsborough County but no impact in Collier County. The bank did not grant any CD loans in its full scope assessment area. MOB, however, originated two CD loans totaling \$4 million for affordable housing in Hillsborough County. These loans are considered responsive and provide 166-units of affordable housing.

Product Innovation and Flexibility

MOB developed the Community First Home Loan Product to offer alternative financing to first-time homebuyers and individuals with limited credit history. The program offers up to 100 percent financing and does not require the borrower to purchase private mortgage insurance. While the program does not

have a maximum income limitation for qualifying, the program has generated over \$15 million in loans and has assisted over 120 low- or moderate-income families nationwide.

Conclusions for Area Receiving Limited Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in Hillsborough County is consistent with the bank's overall Low Satisfactory performance under the Lending Test in Florida. In Hillsborough County, the bank's performance is similar to its overall performance in the state with the additional benefit of community development lending. Refer to the Tables 1 through 11 in the state of Florida section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the investment test in Florida is rated "Low Satisfactory". Based on a full scope review, the bank's performance in the Collier AA is adequate.

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

During the evaluation period, the bank made four donations in Collier County totaling \$45,000. This investment activity represents approximately 0.47 percent of allocated tier one capital. This level of investment represents adequate performance based on their responsiveness to low- and moderate-income individuals.

All of the donations made in this AA during the evaluation period were responsive to community development needs. The investments were made to organizations that provide community services targeted to low- and moderate-income individuals.

Conclusions for Area Receiving Limited Scope Review

Based on limited scope reviews, the bank's performance under the Investment Test in Hillsborough County AA is consistent with the overall "Low Satisfactory" rating under the Investment Test in the state of Florida. Refer to Table 14 in the state of Florida section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the Service Test in Florida is rated "Low Satisfactory". Based on a full scope review, the bank's performance in the Collier County AA is adequate.

Retail Banking Services

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

Service delivery systems are generally accessible to geographies and individuals of different income levels in the AA but branch distribution offers limited benefit to low- and moderate-income individuals. The bank operates one branch in an upper-income census tracts and one branch in a middle-income census tracts. Each branch maintains an ATM. Based on the population distribution of the AA, the branch and ATM coverage is adequate. While the bank does not have any branches or ATMs in low- or moderate-income census tracts, the majority (75 percent) of the population resides in middle and upper-income level areas.

Alternative delivery systems are consistent across the whole bank. Alternative delivery systems include 24-hour telephone banking and Internet banking services. Banking representatives are available during business hours to help customers with each. Customers are able to obtain deposit and loan product information, pay bills electronically, and transfer funds from the bank website.

During the evaluation period, there were no branch closings and one branch opening. The branch was opened in an upper-income census tract. The bank's record of opening and closing branches has not negatively nor positively affected accessibility of its delivery systems, particularly to low- and moderate-income level individuals and areas.

Banking hours and services do not vary significantly at the different branches. Branch hours and services are tailored to meet the needs of each community. Lobby and drive-up hours for branches are similar within all geographies. Full-service banking is offered during regular business hours at all locations.

Community Development Services

The bank provided a limited number of CD services to qualified CD organizations during this evaluation period. The bank provided three qualifying services to organizations in the community. The bank's services included board of director membership for an organization that provides daycare and other services to low- and moderate-income families and a bank staff member providing financial literacy classes. These services are responsive to the needs of the local area. These services are financial in nature and within the expertise of staff providing the service.

Conclusions for Area Receiving Limited Scope Review

Based on a limited scope review, the bank's performance under the Service Test in Hillsborough County is consistent with the bank's overall "Low Satisfactory" performance under the Service Test in Florida. This assessment area has only one branch, which is in a middle-income level area. While there are no branches or ATMs in low- to moderate-income level areas, the majority of the population resides in

middle- and upper-income level areas. Refer to Table 15 in the state of Florida section of Appendix D for the facts and data that support these conclusions.

State of California

CRA Rating for California:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Needs to Improve

The major factors that support this rating include:

- MOB's Low Satisfactory Lending Test rating is based on performance in San Diego County. MOB demonstrates excellent lending activity but marginally adequate distribution of its loans within low- and moderate-income geographies and to low- and moderate-income borrowers. Community development lending has a positive impact on the overall Lending Test performance.
- MOB's Outstanding Investment Test rating in San Diego County is based on its excellent level of investments.
- MOB's Needs to Improve Service Test rating in San Diego County is reflective of a poor branch network but reasonable accessibility via alternative delivery systems, and lack of community development services.

Description of Institution's Operations in California

The bank has delineated the whole counties in which it maintains branches as its AA. Based on its branch network in the state of California and metropolitan boundaries, the bank has two AAs in California. These AAs are San Diego County and San Bernardino County. As of June 30, 2012, total deposits held in its California branches were \$44 million. The bank originated 203 home mortgage and small business loans totaling \$153 million in its combined California AAs during the evaluation period. Deposits in San Diego County branches totaled \$28 million, or 64 percent of deposits held in its California branches. Lending in San Diego County represented the substantial majority (96 percent) of total loans granted within the combined California AAs. For purposes of this evaluation, we performed a full scope review of the bank's performance in San Diego County and a limited review of San Bernardino County.

The bank entered California through the acquisition of the failed First National Bank of Nevada (FNBN) and its affiliate First Heritage Bank in July 2008. Prior to this acquisition, the former management team operated a subprime lending program. MOB ceased all lending operations as subprime lending is not a product the bank offered. As such, MOB had to develop a new strategy for lending in California and rebuild its lending operations. The branches acquired in California (Los Angeles and San Bernardino) were located in upper floors of office buildings and were not visible to the public. MOB closed and relocated all of these branches to more visible locations, but ultimately, MOB closed its Los Angeles area branches. The bank, however, entered the San Diego area with the opening of a branch in May 2010.

Refer to the Market Profile for the state of California in Appendix C for detailed demographics and other performance context information for the assessment area that received a full scope review.

Scope of Evaluation in California

We performed a full scope review of CRA performance of the San Diego County AA. Retail deposits in California branches represent 2 percent of total retail deposits by dollar volume and lending in California AAs represented 2 percent of the total number of reportable lending bank wide. Given its deposit base, performance in California carries very little weight in the overall performance rating.

When determining conclusions for the Lending Test, we weighted loan products by number of loans over the evaluation period. In the California AAs, home mortgage loans represented 92 percent of total reported loans in the AAs and small loans to businesses represented 8 percent of the total. Among HMDA loan categories, home refinance and home purchase represented 58 percent and 42 percent of total HMDA reported loans, respectively. The bank did not grant any home improvement or multifamily loans in California. The bank also did not report any small loans to farms. In San Diego County, we weighted home mortgage products (HMDA reportable loans) more heavily than small loans to businesses.

We contacted two local organizations that specialize in youth services and economic development. The youth services organization mentioned that opportunities exist for financial institutions. Many of the individuals this organization serves are young, have poor credit, and are not very financially responsible. Banks can assist by helping with basic banking education and setting up bank accounts. The community development organization mentioned there are plenty of opportunities in affordable housing, workforce development, and community services support. There are many organizations in the area that are available for financial institutions to partner with and help fund.

The data in the tables in Appendix D include all reportable loans within the bank's AAs. This includes originations and purchases of residential mortgage loans and originations of loans targeted to businesses. When evaluating the geographic and borrower distribution of home mortgage loans and small loans to businesses within the AAs, we emphasized the distribution of loan originations from products targeted to the local AA. The bank primarily used these products to help meet community credit needs.

LENDING TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the Lending Test in California is rated "Low Satisfactory". Based on a full scope review, the bank's performance in the San Diego County AA is adequate.

Lending Activity

Refer to Table 1 Lending Volume in the state of California section of Appendix D for the facts and data used to evaluate the bank's lending activity.

MOB's lending activity in San Diego County reflects excellent responsiveness to AA credit needs. Deposits held by the bank in California represent a relatively low proportion of its retail deposits bank wide. MOB has minimal presence in San Diego County based on its lending and deposits compared to competing financial institutions in the AA. In 2011, MOB ranked 91st out of 591 HMDA-reporters lending in San Diego County and achieved a 0.13 percent market share of all HMDA lending. By comparison, MOB ranked 49th out of 59 financial institutions with branch operations in San Diego County with 0.5 percent deposit market share as of June 30, 2012 according to the FDIC's summary of deposits.

Over the evaluation period, MOB originated or purchased 183 reportable home mortgage loans totaling \$145 million, five reportable small business loans totaling \$2 million, and one community development loan totaling \$1 million in San Diego County. In the AA, home mortgage loans represent the majority of the bank's reportable lending activity at approximately 97 percent of total reportable loans by number and 99 percent by dollar volume. As a percent of mortgage loans, home refinance loans represent 59 percent of total mortgage loans and home purchase loans represent 41 percent. The bank did not grant any home improvement or multifamily loans. Small business loans granted by MOB in the AA represent 3 percent of its reportable loans by number and 1 percent by dollar volume. Based on deposits held in area branches as of June 30, 2012, MOB's local reportable loan-to-local deposit ratio is 526 percent, reflecting an excellent level of lending in the AA.

In the AA by loan product in 2011, the bank achieved a 0.16 percent market share by number of home purchase loans, ranking 78th among 437 reporting lenders and the bank achieved a 0.12 percent market share by number of home refinance loans, ranking 87th among 521 reporting lenders. MOB achieved a 0.01 percent market share by number of small loans to businesses. Considering the large volume of mortgage loans originated in the AA by megabanks, large regional banks, and mortgage companies, these market ranks/shares are reasonable compared to the deposit market rank/share. Many of the larger mortgage lenders do not take deposits in the AA, distorting the comparisons to deposit market share.

Distribution of Loans by Income Level of the Geography

Overall, the distribution of the bank's loans within geographies of different income levels is marginally adequate.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in the state of California section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The distribution of home mortgage loans within geographies of different income levels is poor. Home purchase and home refinance loans had poor performance. However, the bank's poor performance of lending within low- and moderate-income geographies is somewhat mitigated by the fact that the bank did not establish branch operations in San Diego County until May 2010, coupled with the very competitive nature of the San Diego lending market.

The bank did not grant any home purchase loans in low-income census tracts and its home purchase lending is significantly below the percentage of owner-occupied housing in moderate-income census tracts. In addition, the bank's home purchase lending within low- and moderate-income census tracts is below the 2011 HMDA aggregate. The bank's percentage of lending for home refinance is significantly below the percentage of owner-occupied housing in low-income census tracts and the bank did not grant any home refinance loans in moderate-income census tracts. The bank's home refinance lending within low- and moderate-income census tracts is also below the 2011 HMDA aggregate.

In 2011, the bank's market share of home refinance loans in low-income and moderate-income geographies is below the bank's overall market share of home refinance loans within the AA. For home purchase loans, the bank's market share in both low- and moderate-income geographies is below the bank's overall market share of home purchase lending within the AA.

The bank did not grant any home improvement loans or multifamily loans in this AA.

Small Loans to Businesses

Refer to Table 6 in the state of California section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The volume of small business loans granted by the bank in this assessment area is too low to perform any meaningful analysis of this lending. The bank did not grant any small business loans in low-income census tracts, but the bank granted three small business loans in moderate-income geographies.

Lending Gap Analysis

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

Inside/Outside Ratio

A high percentage of MOB's HMDA and CRA reportable loans were originated or purchased within its combined AAs. A majority (76.6 percent of the number and 66.4 percent of the dollar amount) of MOB's HMDA reportable loans were granted within the bank's combined AAs. For all CRA reportable small business loans granted during the evaluation period, MOB originated or purchased 83.1 percent by number, and 75.4 percent by dollar amount, within its combined AAs.

Distribution of Loans by Income Level of the Borrower

Overall, the distribution of the bank's loans to borrowers of different income levels is marginally adequate.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the state of California section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to borrowers of different income levels is poor. Home purchase and home refinance loans had poor performance. However, the bank's poor performance of lending within low- and moderate-income geographies is somewhat mitigated by the fact that the bank did not establish branch operations in San Diego County until May 2010, coupled with the very competitive nature of the San Diego lending market.

The bank's percentage of lending for both home purchase and home refinance was significantly below the percentage of low- and moderate-income families in the AA. Further, the bank's home purchase and home refinance lending among moderate-income borrowers is well below the 2011 HMDA aggregate. The bank's lending to low-income borrowers for both home purchase and home refinance is also below the 2011 HMDA aggregate; however, the aggregate's lending is also well below the percentage of low-income families in the AA.

In 2011, the bank's market share of home refinance loans to low- and moderate-income borrowers is below the bank's overall market share of home refinance loans within the AA. For home purchase loans, the bank's market share of loans to low- and moderate-income borrowers is below its overall market share of home purchase loans within the AA.

MOB entered California through its acquisition of a failed bank in 2008. The prior bank was a subprime lender and this type of lending is not offered by MOB. As such, the bank had to rebuild its lending program, from product offerings to staff to referral partners. In addition, while MOB entered San Bernardino County at the time it acquired the bank from the FDIC, MOB did not enter the San Diego market until May 2010 with a de novo branch. For purposes of this evaluation only and in consideration of MOB's need to create a new lending strategy in California coupled with the level of competition for residential mortgage lending and the specific economic challenges faced by lower income individuals in the AA, we consider the bank's borrower distribution to be marginally adequate.

The bank did not grant any home improvement loans in this AA.

Small Loans to Businesses

Refer to Table 11 in the state of California section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The volume of small business loans granted by the bank in San Diego County is too low to perform any meaningful analysis of this lending. The bank did not grant any small business loans to very small businesses (businesses with revenues of \$1 million or less) in the AA.

Community Development Lending

Refer to Table 1 Lending Volume in the state of California section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending has a positive impact on lending performance in San Diego County. During the evaluation period, MOB originated one CD loan totaling \$1.42 million for affordable housing. This loan is considered responsive and provides 20 units of affordable housing.

Product Innovation and Flexibility

MOB developed the Community First Home Loan Product to offer alternative financing to first-time homebuyers and individual with limited credit history. The program offers up to 100 percent financing and does not require the borrower to purchase private mortgage insurance. While the program does not have a maximum income limitation for qualifying, the program has generated over \$15 million in loans and has assisted over 120 low- or moderate-income families nationwide.

Conclusions for Area Receiving Limited Scope Review

Based on a limited scope review, the bank's performance under the Lending Test in San Bernardino County is consistent with the bank's overall Low Satisfactory performance under the Lending Test in California. In San Bernardino County, the bank's performance is weaker than its overall performance in the state due to much lower lending volumes.

Refer to Tables 1 through 11 in the state of California section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the investment test in California is rated "Outstanding". Based on a full scope review, the bank's performance in San Diego County is excellent.

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

During the evaluation period, the bank made one investment in San Diego County totaling \$1.155 million. This investment activity represents approximately 48 percent of allocated Tier One Capital. This level of investments represents excellent performance based on their responsiveness to credit needs of low- and moderate-income individuals.

In terms of total dollar amount, 99 percent of the bank's investments in this AA were made to organizations focused on affordable housing. Investments include a donation and \$1 million in mortgage backed securities where underlying mortgages were made to low- and moderate-income borrowers. The donation is responsive to community development needs and was made to an organization providing services to low- and moderate-income individuals.

Conclusions for Area Receiving Limited Scope Review

Based on a limited scope review, the bank's performance under the Investment Test in San Bernardino County is weaker than the overall "Outstanding" rating under the Investment Test in the state of California due primarily to the small volume of deposits in this AA. The negative impact is not enough to impair the overall "Outstanding" rating in the state of California. Refer to Table 14 in the state of California section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Area Receiving Full Scope Review

The bank's performance under the Service Test in California is rated "Needs to Improve". Based on a full scope review, the bank's performance in the San Diego County AA is poor.

Retail Banking Services

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

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA but the branch network offers limited access to low- and moderate-income individuals. This is based on a single branch and ATM in San Diego County in an affluent neighborhood. Overall, the AA has only one branch and it is located in an upper-income census tract. The branch maintains an ATM. Based on the population distribution of the AA, approximately 70 percent of the AA population lives outside the upper-income census tract.

Alternative delivery systems are consistent across the whole bank. Alternative delivery systems include 24-hour telephone banking and Internet banking services. Banking representatives are available during business hours to help customers. Customers are able to obtain deposit and loan product information, pay bills electronically, and transfer funds from the bank website. Full-service banking is offered during regular business hours.

During the evaluation period, there were no branch closings and one branch opening. The branch was opened organically and is located in an upper-income census tract. The bank's record of opening and closing branches has not negatively nor positively affected accessibility of its delivery systems, particularly to low- and moderate-income level individuals and areas.

Bank wide, banking hours and services do not vary significantly between branches. Branch hours and services are tailored to meet the needs of each community. Lobby and drive-up hours for branches are similar within all geographies. Full-service banking is offered during regular business hours at all locations.

Community Development Services

The bank did not provide any community development services in San Diego County. The bank provided a limited number of services within the AA during the evaluation period; however, none of the services provided by the bank qualified as community development due to insufficient documentation.

Conclusions for Area Receiving Limited Scope Review

Based on a limited scope review, the bank's performance under the Service Test in the San Bernardo County AA is consistent with the bank's overall "Needs to Improve" performance under the Service Test in California. This AA has the same branch and ATM distribution as the full scope AA with one branch and ATM located in an upper-income census tract. Refer to Table 15 in the state of California section of Appendix D for the facts and data that support these conclusions.

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 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	Lending Test (excludes CD Loans): CD Loans, Investment Test, and Service Test:	04/01/2008 to 12/31/2011 08/19/2008 to 10/29/2012
Financial Institution		Products Reviewed
Mutual of Omaha Bank (MOB) Omaha, Nebraska		Mortgage loans, small business loans, CD loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
None included in evaluation		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Arizona Maricopa County AA Mohave Count AA Pima County AA	Full Scope Limited Scope Limited Scope	Maricopa County, AZ Mohave County, AZ Pima County, AZ
California San Diego County AA San Bernardino County AA	Full Scope Limited Scope	San Diego County, CA San Bernardino County, CA
Colorado Greater Denver AA Boulder County AA	Full Scope Limited Scope	Clear Creek, Denver, Douglas, Jefferson Counties, CO Boulder County, CO
Florida Collier County AA Hillsborough County AA	Full Scope Limited Scope	Collier County, FL Hillsborough County, FL
Nebraska Lancaster County AA Omaha AA	Full Scope Full Scope	Lancaster County, NE Douglas & Sarpy Counties, NE
Nevada Clark County AA Carson City AA Washoe County AA	Full Scope Limited Scope Limited Scope	Clark County, NV Carson City, NV Washoe County, NV
Texas Dallas County AA Harris County AA	Full Scope Limited Scope	Dallas County, TX Harris County, TX

Appendix B: Summary of State Ratings

Ratings for Mutual of Omaha Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
Mutual of Omaha Bank	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State:				
Arizona	Low Satisfactory	Outstanding	Outstanding	Satisfactory
California	Low Satisfactory	Outstanding	Needs to Improve	Satisfactory
Colorado	Low Satisfactory	High Satisfactory	Needs to Improve	Satisfactory
Florida	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Nebraska	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Nevada	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Texas	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

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

Appendix C: Market Profiles for Full Scope Areas

State of Arizona Full Scope Area

Maricopa County AA

Demographic Information for Full Scope Area: Maricopa County AA						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts/BNAs)	663	6.03	27.30	34.69	31.37	0.60
Population by Geography	3,072,149	4.88	28.69	36.78	29.64	0.01
Owner-Occupied Housing by Geography	764,563	1.53	21.47	40.34	36.66	0.00
Businesses by Geography	464,595	3.55	17.80	32.48	46.10	0.07
Farms by Geography	7,678	2.25	19.71	36.19	41.81	0.04
Family Distribution by Income Level	768,800	19.09	18.51	21.75	40.65	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	289,057	7.44	41.75	36.25	14.56	0.00
Median Family Income = \$51,172 HUD Adjusted Median Family Income for 2011 = \$65,500 Households Below the Poverty Level = 10 percent					Median Housing Value = \$130,648 Unemployment Rate = 2.31 percent**	

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

Source: 2000 U.S. Census, and 2011 HUD updated MFI.

(**) According to the Bureau of Labor Statistics, the statewide unemployment rate for Arizona on December 31, 2011 was 8.7 percent.

Maricopa County is located in south-central Arizona and is part of the Phoenix-Mesa-Glendale MSA. The assessment area meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. Maricopa County's population is 3.9 million as of 2012, an increase of 125,000 since the 2010 Census. Maricopa County is the most populous county in the state and is one of the largest land mass counties in Arizona. The county seat is Phoenix, which is Arizona's largest city and capital.

The HUD-adjusted median family income for 2011 was \$65,500. The poverty rate as of the 2000 Census was 10 percent. Approximately 33 percent of the census tracts in Maricopa County are designated as low- or moderate-income and 34 percent of the population reside in these low- or moderate-income geographies.

Leading industries include trade, professional and business services, health and education services, government, and hospitality services. Economic conditions declined significantly between 2008 and 2010 and modestly improved in 2011 and 2012. According to the Bureau of Labor Statistics, the average unemployment rate was 5.2 percent in 2008. The unemployment rate rose significantly to

9.0 percent in 2009 and rose further in 2010 to 9.6 percent. The average annual unemployment rate declined to 8.4 percent in 2011 and further declined to 7.1 percent in 2012.

Housing in Maricopa County is generally affordable. According to the U.S. Census Bureau's 5-Year American Community Survey (2007-2011), Maricopa County's affordability ratio was 3.98, which is 1.13 times the national ratio. The Affordability Ratio measures home ownership opportunity by dividing the median value of owner occupied housing by the median household income of the area. The National Association of Home Builder's (NAHB) Housing Opportunity Index (HOI) for 4th Quarter 2011 further substantiates the generally affordable housing in the county. The HOI for the Maricopa-Mesa-Glendale MSA (including Pinal County) was 83.8 based on the Median Family Income in 2011 and the median home sales price of \$126,000 during fourth quarter 2011. This MSA ranked 92nd out of 225 metropolitan areas monitored nationally. The HOI is defined as the share of homes sold in that area that would have been affordable to a family earning the median income. While these measures indicate that housing is generally affordable, homeownership opportunities remain limited for low- and moderate-income individuals. The high level of foreclosures experienced in the county displaced not only homeowners who could no longer pay their mortgages but also renters of properties that had been foreclosed putting pressure on rental housing demand. Foreclosed homeowners have limited or no opportunity to purchase homes as they are suffering from poor credit and refinance opportunities are limited for many existing homeowners due to negative equity. According to the 5-year American Community Survey from 2007 through 2011, the homeownership rate in Maricopa County is 65.2 percent.

As of June 30, 2012, there are 62 financial institutions with branch operations in Maricopa County. According to the June 30, 2012 FDIC's Summary of Deposits report, MOB ranks 14 with 0.86 percent deposit market share. MOB has deposits of \$530 million distributed among 9 branches serving Maricopa County. Wells Fargo is the number one institution in the county with 26.5 percent of the deposit market share, followed by JP Morgan Chase and Bank of America with 26.0 percent and 20.8 percent market shares, respectively.

We contacted three local economic development organizations serving Maricopa County. The contacts indicated that the majority of the local financial institutions do a good job with community reinvestment. Local institutions are trying to help through leveraging certain projects. There is a need for more lending to low- and moderate-income individuals, especially immigrants with limited education and disadvantaged by language barriers.

State of California Full Scope Area

San Diego County AA

Demographic Information for Full Scope Area: San Diego County AA						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts/BNAs)	605	7.93	22.48	37.69	31.40	0.50
Population by Geography	2,813,833	7.78	24.46	37.46	30.01	0.30
Owner-Occupied Housing by Geography	551,489	2.30	14.03	41.01	42.66	0.00
Businesses by Geography	339,809	4.29	18.44	36.62	40.60	0.04
Farms by Geography	5,511	3.47	16.73	40.79	38.99	0.02
Family Distribution by Income Level	669,102	21.02	17.91	20.09	40.98	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	260,483	13.60	34.90	35.56	15.94	0.00
Median Family Income	= \$53,544					
HUD Adjusted Median Family Income for 2011	= \$74,900					
Households Below the Poverty Level	= 10 percent					
				Median Housing Value	= \$229,602	
				Unemployment Rate	= 2.78 percent**	

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

Source: 2000 U.S. Census, and 2011 HUD updated MFI.

(**) According to the Bureau of Labor Statistics, the statewide unemployment rate for California on December 31, 2011 was 11.2 percent.

San Diego County is located in southern California and is on the U.S./Mexico border. San Diego County makes up the San Diego-Carlsbad-San Marcos MSA. The assessment area meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. San Diego County's population is 3.2 million as of 2012, an increase of 82,000 since the 2010 Census.

The HUD-adjusted median family income for 2011 was \$74,900. The poverty rate as of the 2000 Census was 10 percent. Approximately 30 percent of the census tracts in San Diego County are designated as low- or moderate-income and 32 percent of the population resides in these low- or moderate-income geographies.

Leading industries include government, professional and business services, trade, hospitality services, and health and education services. Top employers include Marine Corps Base Camp Pendleton, Naval Base Coronado, Naval Base San Diego, University of California – San Diego, Qualcomm, Inc., Scripps Health, and Sharp HealthCare. Other companies include Northrup Grumman Corporation and General Dynamics NASSCO. Economic conditions declined significantly between 2008 and 2010 and modestly improved in 2011 and 2012. According to the Bureau of Labor Statistics, the average unemployment rate was 6.0 percent in 2008. The unemployment rate rose significantly to 9.6 percent in 2009 and rose

further in 2010 to 10.5 percent. The average annual unemployment rate declined slightly to 10.0 percent in 2011 and further declined to 8.9 percent in 2012.

Housing in San Diego County is generally expensive. According to the U.S. Census Bureau's 5-Year American Community Survey (2007-2011), San Diego County's affordability ratio was 7.13, which is 2 times the national ratio. The Affordability Ratio measures homeownership opportunity by dividing the median value of owner occupied housing by the median household income of the area. The National Association of Home Builders' (NAHB) Housing Opportunity Index (HOI) for 4th Quarter 2011 further substantiates the high housing costs in the county. The HOI for the San Diego-Carlsbad-San Marcos MSA was 57.3 based on the Median Family Income in 2011 and the median home sales price of \$300,000 during fourth quarter 2011. This MSA ranked 213th out of 225 metropolitan areas monitored nationally. The HOI is defined as the share of homes sold in that area that would have been affordable to a family earning the median income. Based on these measures, homeownership opportunities are limited for low- and moderate-income individuals. The high level of foreclosures experienced in the county displaced not only homeowners who could no longer pay their mortgages but also renters of properties that had been foreclosed putting pressure on rental housing demand. Foreclosed homeowners have limited or no opportunity to purchase homes as they are suffering from poor credit and refinance opportunities are limited for many existing homeowners due to negative equity. Another barrier to homeownership for low-, moderate-, and middle-income individuals is investor and cash buyers that compete for available housing stock for investment purposes. According to the 5-year American Community Survey from 2007 through 2011, the homeownership rate in San Diego County is 55.2 percent.

As of June 30, 2012, there are 59 financial institutions with branch operations in San Diego County. According to the June 30, 2012 FDIC's Summary of Deposits report, MOB ranks 49th with 0.05 percent deposit market share. MOB has deposits of \$28 million in one branch serving San Diego County. Wells Fargo is the number one institution in the county with 24.6 percent of the deposit market share, followed by Union Bank, Bank of America, and JP Morgan Chase Bank with 16.1 percent, 14.0 percent, and 11.7 percent market shares, respectively.

We contacted two local organizations that specialize in youth services and economic development. The youth services organization mentioned that opportunities exist for financial institutions. Many of the individuals this organization serves are young, have poor credit, and are not very financially responsible. Banks can assist by helping with basic banking education and setting up bank accounts. The community development organization mentioned there are plenty of opportunities in affordable housing, workforce development, and community services support. There are many organizations in the area that are available for financial institutions to partner with and help fund.

State of Colorado Full Scope Area

Greater Denver AA

Demographic Information for Full Scope Area: Greater Denver AA						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts/BNAs)	311	5.14	24.44	36.98	32.80	0.64
Population by Geography	1,265,231	5.29	26.11	36.32	32.07	0.20
Owner-Occupied Housing by Geography	331,208	2.38	19.72	38.22	39.68	0.00
Businesses by Geography	213,135	3.96	19.57	34.90	40.24	1.34
Farms by Geography	3,219	2.24	16.93	30.26	49.89	0.68
Family Distribution by Income Level	314,198	18.29	17.63	22.60	41.48	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	112,867	9.00	39.72	34.64	16.63	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below the Poverty Level	= \$61,301 = \$78,200 = 8 percent				Median Housing Value = \$190,066 Unemployment Rate = 2.23 percent**	

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

Source: 2000 U.S. Census, and 2011 HUD updated MFI.

(**) According to the Bureau of Labor Statistics, the statewide unemployment rate for Colorado on December 31, 2011 was 8.3 percent.

MOB’s Greater Denver AA covers the Counties of Clear Creek, Denver, Douglas, and Jefferson. These four counties along with six other counties make up the Denver-Aurora-Broomfield MSA. Denver is located in the center of the Front Range Urban Corridor, between the Rocky Mountains to the west and the High Plains to the east. The assessment area meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The Greater Denver AA has a combined population of 1.5 million as of 2012, an increase of 58,000 since the 2010 Census. Denver County is the second most populous county in Colorado after El Paso County, which surpassed Denver County as of the 2010 Census. Denver is the largest city and the capital of Colorado.

The HUD-adjusted median family income for 2011 was \$78,200. The poverty rate as of the 2000 Census was 8 percent. Approximately 30 percent of the census tracts in this AA are designated as low- or moderate-income and 31 percent of the population reside in these low- or moderate-income geographies.

Leading industries include trade, professional and business services, government, health and education services, and hospitality services. Economic conditions declined significantly between 2008 and 2010 and modestly improved in 2011 and 2012. According to the Bureau of Labor Statistics, the average unemployment rate varied by county but experienced the same trends. Denver

County experienced the highest unemployment rates and Douglas County experienced the lowest unemployment rates. In Denver County, the average unemployment rate was 5.3 percent in 2008, rose to 10.0 percent by 2010, and began declining to 8.5 percent in 2012. In Jefferson County, the average unemployment rate was 4.7 percent in 2008, rose to 8.7 percent by 2010, and began declining to 7.6 percent in 2012. In Clear Creek County, the average unemployment rate was 4.6 percent in 2008, rose to 8.3 percent by 2010, and began declining to 7.4 percent in 2012. In Douglas County, the average unemployment rate was 4.2 percent in 2008, rose to 7.1 percent by 2010, and began declining to 6.4 percent in 2012.

Housing is generally affordable in Douglas and Jefferson Counties and relatively expensive in Clear Creek and Denver Counties. According to the U.S. Census Bureau's 5-Year American Community Survey (2007-2011), Douglas County's affordability ratio was 3.34, or 95 percent of the national ratio and Jefferson County's affordability ratio was 3.82, or 108 percent of the national ratio. In Clear Creek County, the affordability ratio (4.46) was 1.26 times the national ratio and in Denver County, the ratio (5.12) was 1.4 times the national ratio. The Affordability Ratio measures homeownership opportunity by dividing the median value of owner occupied housing by the median household income of the area. According to the National Association of Home Builders' (NAHB) Housing Opportunity Index (HOI) for 4th Quarter 2011, the HOI for the Denver-Aurora-Broomfield MSA (including all 10 counties in the MSA) was 79.1 based on the Median Family Income in 2011 and the median home sales price of \$210,000 during fourth quarter 2011. This MSA ranked 141st out of 225 metropolitan areas monitored nationally. The HOI is defined as the share of homes sold in that area that would have been affordable to a family earning the median income. According to the 5-year American Community Survey from 2007 through 2011, the homeownership rates ranged from a low of 51.7 percent in Denver County to 81.5 percent in Douglas County.

As of June 30, 2012, there are 53 financial institutions with branch operations in the Greater Denver AA. According to the June 30, 2012 FDIC's Summary of Deposits report, MOB ranks 20th with 0.58 percent deposit market share. MOB has deposits of \$249 million distributed among six branches serving the Greater Denver AA. Wells Fargo is the number one institution in the county with 27.6 percent of the deposit market share, followed by US Bank, FirstBank, and JP Morgan Chase Bank with 14.6 percent, 13.1 percent, and 12.7 percent market shares, respectively.

We contacted two local affordable housing organizations. One contact indicated that opportunities for financial institutions include financial literacy and basic banking education, project financing, small business loans, and working capital loans for non-profit organizations to name a few. One contact mentioned that local financial institutions tend to focus on one niche like revitalization but are unwilling to participate in affordable housing initiatives. As such, affordable housing presents an opportunity for financial institutions. The contact also mentioned that brokerage firms do a better job than financial institutions of providing financing to low- and moderate-income individuals. Another contact mentioned that some financial institutions are active partners with local organizations for community development, while other institutions are unwilling to participate in some projects.

State of Florida Full Scope Area

Collier County AA

Demographic Information for Full Scope Area: Collier County AA						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts/BNAs)	52	7.69	17.31	44.23	30.77	0.00
Population by Geography	251,377	7.48	18.77	45.24	28.51	0.00
Owner-Occupied Housing by Geography	77,829	2.30	13.08	47.98	36.65	0.00
Businesses by Geography	60,532	1.46	10.63	44.78	43.14	0.00
Farms by Geography	1,406	3.98	19.27	52.42	24.32	0.00
Family Distribution by Income Level	71,823	19.06	19.32	20.65	40.97	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	27,566	11.06	23.57	46.02	19.35	0.00
Median Family Income	= \$54,531					
HUD Adjusted Median Family Income for 2011	= \$71,800					
Households Below the Poverty Level	= 8 percent					
				Median Housing Value	= \$191,305	
				Unemployment Rate	= 1.59 percent**	

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

Source: 2000 U.S. Census, and 2011 HUD updated MFI.

(**) According to the Bureau of Labor Statistics, the statewide unemployment rate for Florida on December 31, 2011 was 9.4 percent.

Collier County is located at the southern end of Florida's Gulf Coast. Collier County makes up the Naples-Marco Island MSA. The assessment area meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. Collier County's population is approximately 332,000 as of 2012, an increase of 11,000 since the 2010 Census.

The HUD-adjusted median family income for 2011 was \$71,800. The poverty rate as of the 2000 Census was 8 percent. Approximately 26 percent of the census tracts in Collier County are designated as low- or moderate-income and 26 percent of the population resides in these low- or moderate-income geographies.

Leading industries include hospitality services, trade, and health and education services. Economic conditions declined significantly between 2008 and 2010 and modestly improved in 2011 and 2012. According to the Bureau of Labor Statistics, the average unemployment rate was 6.9 percent in 2008. The unemployment rate rose significantly to 10.9 percent in 2009 and rose further in 2010 to 11.6 percent. The average annual unemployment rate declined to 10.2 percent in 2011 and further declined to 8.5 percent in 2012.

Housing in Collier County is relatively expensive. According to the U.S. Census Bureau's 5-Year American Community Survey (2007-2011), Collier County's affordability ratio was 5.58, which is 1.58 times the national ratio. The Affordability Ratio measures homeownership opportunity by dividing the median value of owner occupied housing by the median household income of the area. The National Association of Home Builders (NAHB) Housing Opportunity Index (HOI) for 4th Quarter 2011 further substantiates the high cost of housing in the county. The HOI for the Naples-Marco Island MSA was 67.9 based on the Median Family Income in 2011 and the median home sales price of \$185,000 during fourth quarter 2011. This MSA ranked 197th out of 225 metropolitan areas monitored nationally. The HOI is defined as the share of homes sold in that area that would have been affordable to a family earning the median income. The high level of foreclosures experienced in Florida displaced not only homeowners who could no longer pay their mortgages but also renters of properties that had been foreclosed putting pressure on rental housing demand. Foreclosed homeowners have limited or no opportunity to purchase homes as they are suffering from poor credit and refinance opportunities are limited for many existing homeowners due to negative equity. Another barrier to homeownership for low-, moderate-, and middle-income individuals is investor and cash buyers that compete for available housing stock for investment purposes. According to the 5-year American Community Survey from 2007 through 2011, the homeownership rate in Collier County is 76.1 percent.

As of June 30, 2012, there are 39 financial institutions with branch operations in Collier County. According to the June 30, 2012 FDIC's Summary of Deposits report, MOB ranks 19th with 1.04 percent deposit market share. MOB has deposits of \$112 million distributed among two branches serving Collier County. Fifth Third Bank is the number one institution in the county with 17.9 percent of the deposit market share, followed by Wells Fargo, Bank of America, and KeyBank with 12.7 percent, 9.6 percent, and 9.1 percent market shares, respectively.

We contacted two local affordable housing organizations. The contacts stated that opportunities for financial institutions are present. Some of those opportunities are homebuyer education programs, board or committee memberships, or just to give a borrower that lost a job during the recession another chance. One contact mentioned the smaller financial institutions in the area are easier to work with than the larger institutions. Another contact stated that some local financial institutions have a history of community development participation, while others do not. This contact would like to see increased local institution participation.

State of Nebraska Full Scope Areas

Lancaster County AA

Demographic Information for Full Scope Area: Lancaster County AA						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts/BNAs)	59	3.39	25.42	38.98	25.42	6.78
Population by Geography	250,291	3.32	21.12	49.31	24.05	2.20
Owner-Occupied Housing by Geography	59,967	0.63	13.30	55.94	30.13	0.00
Businesses by Geography	27,754	2.05	23.20	42.12	31.65	0.98
Farms by Geography	1,273	0.16	7.15	67.56	25.06	0.08
Family Distribution by Income Level	61,372	17.18	19.02	26.09	37.71	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	22,213	4.16	30.54	53.01	12.29	0.00
Median Family Income = \$53,463 HUD Adjusted Median Family Income for 2011 = \$69,500 Households Below the Poverty Level = 10 percent			Median Housing Value = \$106,015 Unemployment Rate = 2.1 percent**			

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

Source: 2000 U.S. Census, and 2011 HUD updated MFI.

(**) According to the Bureau of Labor Statistics, the statewide unemployment rate for Nebraska on December 31, 2011 was 4.2 percent.

Lancaster County is located in southeastern Nebraska and is part of the Lincoln MSA. The assessment area meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. Lancaster County’s population is approximately 293,000 as of 2012, an increase of 8,000 since the 2010 Census. The county seat is Lincoln, which is also the State’s capital.

The HUD-adjusted median family income for 2011 was \$69,500. The poverty rate as of the 2000 Census was 10 percent. Approximately 29 percent of the census tracts in Lancaster County are designated as low- or moderate-income and 24 percent of the population resides in these low- or moderate-income geographies.

Leading industries include government, trade, and health and education services. Top employers are the State of Nebraska, Lincoln Public Schools, University of Nebraska-Lincoln, and Bryan Health. Economic conditions modestly weakened between 2008 and 2009 but have gradually improved since. According to the Bureau of Labor Statistics, the average unemployment rate was 3.0 percent in 2008 and rose to 4.3 percent in 2009. Between 2010 and 2012, the average annual unemployment rate steadily declined from 4.2 percent in 2010 to 3.6 percent in 2012.

Housing in Lancaster County is generally affordable. According the U.S. Census Bureau's 5-Year American Community Survey (2007-2011), Lancaster County's affordability ratio was 2.86, or 81 percent of the national ratio. The Affordability Ratio measures homeownership opportunity by dividing the median value of owner occupied housing by the median household income of the area. According to the 5-year American Community Survey from 2007 through 2011, the homeownership rate in Lancaster County is 61.8 percent.

As of June 30, 2012, there are 24 financial institutions with branch operations in Lancaster County. According to the June 30, 2012 FDIC's Summary of Deposits report, MOB ranks 14th with 1.29 percent deposit market share. MOB has deposits of \$75 million distributed among two branches serving Lancaster County. Union Bank and Trust is the number one institution in the county with 25.3 percent of the deposit market share, followed by Wells Fargo and US Bank with 19.2 percent and 12.6 percent market shares, respectively.

Omaha AA

Demographic Information for Full Scope Area: Omaha AA						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts/BNAs)	180	3.89	25.56	42.78	27.78	0.00
Population by Geography	586,180	2.57	25.11	43.94	28.37	0.00
Owner-Occupied Housing by Geography	145,257	1.31	18.58	46.71	33.39	0.00
Businesses by Geography	61,033	1.90	16.39	43.61	38.10	0.00
Farms by Geography	1,634	0.61	9.24	48.59	41.55	0.00
Family Distribution by Income Level	149,474	17.04	18.37	23.98	40.62	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	52,919	4.30	39.69	43.25	12.77	0.00
Median Family Income = \$53,955 HUD Adjusted Median Family Income for 2011 = \$70,600 Households Below the Poverty Level = 8 percent					Median Housing Value = \$106,847 Unemployment Rate = 1.98 percent**	

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

Source: 2000 U.S. Census, and 2011 HUD updated MFI.

(**) According to the Bureau of Labor Statistics, the statewide unemployment rate for Nebraska on December 31, 2011 was 4.2 percent.

MOB's Omaha AA covers the Counties of Douglas and Sarpy. Douglas and Sarpy Counties are located in eastern Nebraska and share a border with the State of Iowa. These two counties along with three other counties in Nebraska and three counties in Iowa make up the Omaha-Council Bluffs, NE-IA MSA. The assessment area meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The Omaha AA's combined population is approximately 697,000 as of 2012, an increase of 21,000 since the 2010 Census.

The HUD-adjusted median family income for 2011 was \$70,600. The poverty rate as of the 2000 Census was 8 percent. Approximately 29 percent of the census tracts in Douglas and Sarpy Counties are designated as low- or moderate-income and 28 percent of the population reside in these low- or moderate-income geographies.

Leading industries include trade, health and education services, professional and business services, and government. Top employers include Offutt Air Force Base, Alegent Health Inc., The Methodist Hospital System, First Data Card Services Group, and Nebraska Medical Center. Other companies include Union Pacific Railroad, ConAgra Foods Inc., PayPal, and Mutual of Omaha Co. Economic conditions weakened between 2008 and 2010 and modestly improved in 2011 and 2012. According to the Bureau of Labor Statistics, the average unemployment rate varied by county but experienced the same trends. In Douglas County, the average unemployment rate was 3.6 percent in 2008, rose to 5.4 percent by 2010, and began declining to 4.5 percent in 2012. In Sarpy County, the average

unemployment rate was 3.2 percent in 2008, rose to 4.8 percent by 2010, and began declining to 4.1 percent in 2012.

Housing in the Omaha AA is generally affordable. According to the U.S. Census Bureau's 5-Year American Community Survey (2007-2011), Douglas County's affordability ratio was 2.69, or 76 percent of the national ratio and Sarpy County's affordability ratio was 2.33, or 66 percent of the national ratio. The Affordability Ratio measures homeownership opportunity by dividing the median value of owner occupied housing by the median household income of the area. According to the 5-year American Community Survey from 2007 through 2011, the homeownership rates ranged from 64.1 percent in Douglas County to 71.4 percent in Sarpy County.

As of June 30, 2012, there are 37 financial institutions with branch operations in the Omaha AA. According to the June 30, 2012 FDIC's Summary of Deposits report, MOB ranks 9th with 3 percent deposit market share. MOB has deposits of \$540 million distributed among five branches serving the Omaha AA. First National Bank of Omaha is the number one institution in the county with 35.4 percent of the deposit market share, followed by Wells Fargo and US Bank with 16.8 percent and 9.4 percent market shares respectively. *Note:* Deposit market share data is adjusted to exclude \$2.6 billion in deposits held by MOB in conjunction with its nationwide Community Association Banking management services.

We contacted two community organizations in the Omaha area. One community contact was an economic development organization and the other was an affordable housing organization. Both groups indicated that while credit standards have tightened, local financial institutions are doing a good job being involved with the community. Institutions participate in community development opportunities, such as loan pools, membership with community development organizations, Habitat for Humanity, and others. One contact also specifically mentioned how the Community Reinvestment Act has a very positive impact on community involvement in this area.

State of Nevada Full Scope Area

Clark County AA

Demographic Information for Full Scope Area: Clark County AA						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts/BNAs)	345	2.03	22.61	42.61	31.59	1.16
Population by Geography	1,375,765	2.05	27.84	41.73	28.38	0.00
Owner-Occupied Housing by Geography	302,842	0.39	16.32	44.57	38.72	0.00
Businesses by Geography	142,262	2.24	17.24	37.56	42.56	0.41
Farms by Geography	1,902	0.84	13.93	41.64	43.48	0.11
Family Distribution by Income Level	342,405	18.69	18.74	23.47	39.10	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	128,150	3.04	40.22	40.59	16.15	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below the Poverty Level	= \$50,504 = \$63,400 = 10 percent				Median Housing Value = \$127,982 Unemployment Rate = 3.25 percent**	

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

Source: 2000 U.S. Census, and 2011 HUD updated MFI.

(**) According to the Bureau of Labor Statistics, the statewide unemployment rate for Nevada on December 31, 2011 was 12.3 percent.

Clark County, located in southern Nevada, makes up the Las Vegas-Paradise MSA. The assessment area meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. Clark County’s population is 2.0 million as of 2012, an increase of 49,000 since the 2010 Census. Clark County is the most populous county in the state.

The HUD-adjusted median family income for 2011 was \$63,400. The poverty rate as of the 2000 Census was 10 percent. Approximately 25 percent of the census tracts in Clark County are designated as low- or moderate-income and 30 percent of the population resides in these low- or moderate-income geographies.

Leading industries include hospitality services, trade, professional and business services, and government. Top employers include Clark County School District, Clark County, Wynn Las Vegas LLC, Bellagio LLC, MGM Grand Hotel/Casino, Aria Resort and Casino LLC, Mandalay Bay Resort and Casino, Las Vegas Metropolitan Police, University of Nevada – Las Vegas, and Caesar’s Palace. Other companies include Venetian Casino Resorts LLC, Mirage Casino Hotel, University Medical Center of Southern Nevada, The Palazzo Casino Resort, and the Flamingo Las Vegas. Economic conditions declined significantly between 2008 and 2010 and slightly improved in 2011 and 2012. According to the Bureau of Labor Statistics, the average unemployment rate was 7.0 percent in 2008.

The unemployment rate rose significantly to 11.9 percent in 2009 and rose further in 2010 to 14.2 percent. The average annual unemployment rate declined to 13.5 percent in 2011 and further declined to 11.2 percent in 2012.

Housing in Clark County is generally affordable. According to the U.S. Census Bureau's 5-Year American Community Survey (2007-2011), Clark County's affordability ratio was 4.04, which is 1.14 times the national ratio. The Affordability Ratio measures homeownership opportunity by dividing the median value of owner occupied housing by the median household income of the area. The National Association of Home Builders' (NAHB) Housing Opportunity Index (HOI) for 4th Quarter 2011 further substantiates the generally affordable housing in the county. The HOI for the Las Vegas-Paradise MSA was 88.3 based on the Median Family Income in 2011 and the median home sales price of \$117,000 during fourth quarter 2011. This MSA ranked 43rd out of 225 metropolitan areas monitored nationally. The HOI is defined as the share of homes sold in that area that would have been affordable to a family earning the median income. While these measures indicate that housing is generally affordable, homeownership opportunities remain limited for low- and moderate-income individuals. The high level of foreclosures experienced in the county displaced not only homeowners who could no longer pay their mortgages but also renters of properties that had been foreclosed putting pressure on rental housing demand. Foreclosed homeowners have limited or no opportunity to purchase homes as they are suffering from poor credit and refinance opportunities are limited for many existing homeowners due to negative equity. According to the 5-year American Community Survey from 2007 through 2011, the homeownership rate in Clark County is 57.0 percent.

As of June 30, 2012, there are 40 financial institutions with branch operations in Clark County. According to the June 30, 2012 FDIC's Summary of Deposits report, MOB ranks 12th with 0.80 percent deposit market share. MOB has deposits of \$298 million distributed among five branches serving Clark County. Bank of America is the number one institution in the county with 24.7 percent of the deposit market share, followed by Wells Fargo and Citibank with 22.1 percent and 10.6 percent market shares, respectively.

We contacted a local organization that specializes in economic development and affordable housing. The community development organization stated there are plenty of opportunities to serve this community. The contact stated that local financial institution involvement is reasonable with some financial institutions being more responsive than others. The contact mentioned that some banks are bold and innovative with their approach to community development. Banks participate in local housing organizations' down payment and closing cost programs. The contact mentioned that opportunities exist in the form of grants or investments for operational or capital support in local organizations. The contact also felt that financial institutions could work harder to design bank products for low- and moderate-income individuals.

State of Texas Full Scope Area

Dallas County AA

Demographic Information for Full Scope Area: Dallas County AA						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts/BNAs)	487	12.32	35.73	28.95	22.18	0.82
Population by Geography	2,218,899	11.31	37.04	30.75	20.90	0.00
Owner-Occupied Housing by Geography	424,788	4.24	29.53	35.01	31.22	0.00
Businesses by Geography	313,576	5.26	27.40	32.82	32.66	1.86
Farms by Geography	4,222	4.55	28.04	34.49	32.14	0.78
Family Distribution by Income Level	538,109	26.10	20.12	20.22	33.56	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	248,675	17.47	46.94	26.80	8.79	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below the Poverty Level	= \$56,313 = \$69,600 = 11 percent	Median Housing Value = \$112,845 Unemployment Rate = 2.81 percent**				

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

Source: 2000 U.S. Census, and 2011 HUD updated MFI.

(**) According to the Bureau of Labor Statistics, the statewide unemployment rate for Texas on December 31, 2011 was 7.4 percent.

Dallas County along with seven other counties make up the Dallas-Plano-Irving MD. The assessment area meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. Dallas County's population is 2.5 million as of 2012, an increase of 86,000 since the 2010 Census.

The HUD-adjusted median family income for 2011 was \$69,600. The poverty rate as of the 2000 Census was 11 percent. Approximately 48 percent of the census tracts in Dallas County are designated as low- or moderate-income and 48 percent of the population resides in these low- or moderate-income geographies.

Leading industries include trade, professional and business services, government, health and education services, and hospitality services. Major employers include Texas Instruments, HP Enterprise Services, Dell Services, i2, AT&T, Ericsson, and Verizon. Several major defense manufacturers, including Lockheed Martin, Bell Helicopter Textron, and Raytheon, maintain significant operations in the county. ExxonMobil is headquartered in Irving, Texas. Economic conditions declined significantly between 2008 and 2010 and modestly improved in 2011 and 2012. According to the Bureau of Labor Statistics, the average unemployment rate was 5.5 percent in 2008. The unemployment rate rose significantly to 8.2 percent in 2009 and rose further in 2010 to 8.8

percent. The average annual unemployment rate declined to 8.4 percent in 2011 and further declined to 7.2 percent in 2012.

Housing in Dallas County is generally affordable. According to the U.S. Census Bureau's 5-Year American Community Survey (2007-2011), Dallas County's affordability ratio was 2.64, which is 75 percent of the national ratio. The Affordability Ratio measures homeownership opportunity by dividing the median value of owner occupied housing by the median household income of the area. The National Association of Home Builders (NAHB) Housing Opportunity Index (HOI) for 4th Quarter 2011 further substantiates the generally affordable housing in the county. The HOI for the Dallas-Plano-Irving MSA was 74.1 based on the Median Family Income in 2011 and the median home sales price of \$162,000 during fourth quarter 2011. This MSA ranked 178th out of 225 metropolitan areas monitored nationally. The HOI is defined as the share of homes sold in that area that would have been affordable to a family earning the median income. According to the 5-year American Community Survey from 2007 through 2011, the homeownership rate in Dallas County is 54.2 percent.

As of June 30, 2012, there are 103 financial institutions with branch operations in Dallas County. According to the June 30, 2012 FDIC's Summary of Deposits report, MOB ranks 53rd with 0.09 percent deposit market share. MOB has deposits of \$107 million distributed among two branches serving Dallas County. Bank of America and JP Morgan Chase dominate the deposit market with 38.5 percent and 23.7 percent, respectively, of the deposit market share. Wells Fargo is a distant third with a 5.8 percent deposit market share.

We contacted two local organizations that specialize in affordable housing and economic development. The affordable housing contact mentioned a lack of funding in the area for transit-oriented development projects. The contact expressed concern over the sheer numbers of foreclosures that gives the impression that banks are not working with the borrowers to avoid foreclosure. The economic development contact stated there are plenty of opportunities in the area, such as lending to low- and moderate-income individuals, investing in non-profit organizations and charities, and offering basic banking education. The contact said that financial institutions have demonstrated a willingness to work with the community. There is a good working relationship between the organizations and local financial institutions. However, the contact mentioned that financial institutions have shown a preference of working with organizations rather than directly with low- and moderate-income level individuals. There is also a need for more branches in the area to provide more opportunity for new account opening and face-to-face interaction.

Appendix D: 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: (1) 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 MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and percent Bank Loans Column in Core Tables 8 through 12 and part of Table 13. 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 MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- 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 MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate 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 aggregate 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 aggregate information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate 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 MA/assessment area. The table also presents aggregate 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. Aggregate 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. Aggregate 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 MA/assessment area.

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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 MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Tables of Performance Data

State of Arizona

Table 1. Lending Volume

LENDING VOLUME												
Geography: ARIZONA												
Evaluation Period: July 25, 2008 to December 31, 2011												
MA/Assessment Area:	percent of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		percent of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Maricopa County AA	85.03	576	157,989	152	39,089	0	0	5	15,070	733	212,148	80.66
Limited Review:												
Mohave County AA	1.39	10	1,258	2	130	0	0	0	0	12	1,388	5.91
Pima County AA	13.57	92	29,341	25	4,911	0	0	0	0	117	34,252	13.42

* Loan Data as of December 31, 2011. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from August 19, 2008 to October 29, 2012.

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: ARIZONA								Evaluation Period: July 25, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Maricopa County AA	362	88.51	1.53	1.38	21.47	54.70	40.34	13.54	36.66	30.39	0.45	13.15	43.46	42.94
Limited Review:														
Mohave County AA	5	1.22	0.00	0.00	9.84	0.00	74.76	100.00	15.40	0.00	0.00	4.12	77.54	18.35
Pima County AA	42	10.27	2.25	2.38	24.74	0.00	36.40	28.57	36.61	69.05	1.72	17.87	36.13	44.28

* Based on 2011 Peer Mortgage Data: US.

** Home purchase loans originated and purchased in the MA/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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: ARIZONA								Evaluation Period: July 25, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Maricopa County AA	22	88.00	1.53	0.00	21.47	0.00	40.34	45.45	36.66	54.55	1.07	11.31	36.39	51.22
Limited Review:														
Mohave County AA	1	4.00	0.00	0.00	9.84	0.00	74.76	100.00	15.40	0.00	0.00	12.62	67.96	19.42
Pima County AA	2	8.00	2.25	0.00	24.74	0.00	36.40	50.00	36.61	50.00	6.69	14.62	29.70	48.99

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: ARIZONA								Evaluation Period: July 25, 2008 to December 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Maricopa County AA	187	78.90	1.53	0.00	21.47	1.60	40.34	18.72	36.66	79.68	0.34	7.55	33.54	58.56
Limited Review:														
Mohave County AA	4	1.69	0.00	0.00	9.84	25.00	74.76	75.00	15.40	0.00	0.00	3.58	76.09	20.32
Pima County AA	46	19.41	2.25	0.00	24.74	4.35	36.40	10.87	36.61	84.78	0.51	11.00	28.54	59.94

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: ARIZONA								Evaluation Period: July 25, 2008 to December 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Maricopa County AA	5	71.43	6.97	20.00	40.88	20.00	36.33	40.00	15.82	20.00	4.82	45.78	30.12	19.28
Limited Review:														
Mohave County AA	0	0.00	0.00	0.00	2.08	0.00	83.28	0.00	14.64	0.00	0.00	0.00	100.00	0.00
Pima County AA	2	28.57	5.05	0.00	38.28	50.00	38.41	50.00	18.26	0.00	4.55	45.45	34.09	15.91

* Based on 2011 Peer Mortgage Data: US.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: ARIZONA				Evaluation Period: January 1, 2010 to December 31, 2011			
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (percent) by Tract Income *								
	#	percent of Total**	percent of Businesses***	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	Low	Mod	Middle	Upper					
Full Review:																			
Maricopa County AA	152	84.92	3.55	13.16	17.80	23.68	32.48	25.66	46.10	37.50	3.77	16.55	29.91	49.77					
Limited Review:																			
Mohave County AA	2	1.1	0.00	0.00	5.03	0.00	78.62	100.00	16.35	0.00	0.00	3.86	80.31	15.83					
Pima County AA	25	13.97	3.07	0.00	24.95	40.00	33.33	36.00	38.65	24.00	2.36	24.31	30.75	42.58					

* Based on 2011 Peer Small Business Data: US.

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

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ARIZONA								Evaluation Period: July 25, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Maricopa County AA	362	88.51	19.09	4.52	18.51	5.16	21.75	12.26	40.65	78.06	13.92	23.49	21.18	41.40
Limited Review:														
Mohave County AA	5	1.22	16.72	0.00	19.88	0.00	23.98	0.00	39.42	100.00	8.46	20.14	19.78	51.62
Pima County AA	42	10.27	20.12	0.00	18.51	14.29	21.13	16.67	40.24	69.05	12.95	23.85	25.02	38.18

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 50.9% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: ARIZONA								Evaluation Period: July 25, 2008 to December 31, 2011			
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Maricopa County AA	22	88.00	19.09	0.00	18.51	0.00	21.75	22.73	40.65	77.27	9.60	18.23	23.43	48.74
Limited Review:														
Mohave County AA	1	4.00	16.72	0.00	19.88	0.00	23.98	100.00	39.42	0.00	9.38	17.71	25.00	47.92
Pima County AA	2	8.00	20.12	0.00	18.51	50.00	21.13	50.00	40.24	0.00	7.31	20.13	25.81	46.75

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: ARIZONA								Evaluation Period: July 25, 2008 to December 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Maricopa County AA	187	78.90	19.09	2.73	18.51	7.65	21.75	13.66	40.65	75.96	7.86	14.58	20.11	57.44
Limited Review:														
Mohave County AA	4	1.69	16.72	0.00	19.88	75.00	23.98	25.00	39.42	0.00	8.54	16.00	20.88	54.58
Pima County AA	46	19.41	20.12	4.44	18.51	15.56	21.13	13.33	40.24	66.67	7.53	14.51	21.06	56.91

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.1% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: ARIZONA			Evaluation Period: January 1, 2010 to December 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 Million or Less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data *	
	#	percent of Total**	percent of Businesses*	percent BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Revenues \$1 Million or Less
Full Review:									
Maricopa County AA	152	84.92	66.50	26.32	44.08	21.05	34.87	81,071	35,253
Limited Review:									
Mohave County AA	2	1.12	72.32	0.00	100.00	0.00	0.00	3,032	1,323
Pima County AA	25	13.97	66.16	36.00	64.00	12.00	24.00	16,109	7,342

* Based on 2011 Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/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 - 2011).

**** 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 7.82% of small loans to businesses originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ARIZONA				Evaluation Period: August 19, 2008 to October 29, 2012			
MA/Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	percent of Total	#	\$(000's)
Full Review:									
Maricopa County AA	0	0	7	14,572	7	14,572	93.21	0	0
Limited Review:									
Mohave County AA	0	0	0	0	0	0	0.00	0	0
Pima County AA	0	0	2	1,062	2	1,062	6.79	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: ARIZONA																	
Evaluation Period: August 19, 2008 to October 29, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	percent of Rated Area Deposits in AA	# of BANK Branches	percent of Rated Area Branches in AA	Location of Branches by Income of Geographies (percent)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				percent of Population Within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Maricopa County AA	80.66 percent	8	72.73 percent	1	2	2	3	2	4	0	0	0	-2	4.88	28.69	36.78	29.64
Limited Review:																	
Mohave County AA	5.91 percent	1	9.09 percent	0	0	1	0	0	0	0	0	0	0	0.00	10.22	75.87	13.91
Pima County AA	13.42 percent	2	18.18 percent	0	1	1	0	1	1	0	1	0	-1	4.41	33.94	33.03	28.62

Tables of Performance Data

State of California

Table 1. Lending Volume

LENDING VOLUME												
Geography: CALIFORNIA												
Evaluation Period: July 25, 2008 to December 31, 2011												
MA/Assessment Area:	percent of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		percent of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
San Diego County AA	92.65	183	144,534	5	2,100	0	0	1	1,420	189	148,054	64.04
Limited Review:												
San Bernardino County AA	7.35	4	3,151	11	3,010	0	0	0	0	15	6,161	35.96

* Loan Data as of December 31, 2011. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from August 19, 2008 to October 29, 2012.

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: CALIFORNIA								Evaluation Period: July 25, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
San Diego County AA	76	96.20	2.30	0.00	14.03	2.63	41.01	21.05	42.66	76.32	3.63	13.08	40.20	43.09
Limited Review:														
San Bernardino County AA	3	3.80	1.80	0.00	22.75	0.00	45.09	33.33	30.37	66.67	1.17	22.13	48.57	28.12

* Based on 2011 Peer Mortgage Data: US.

** Home purchase loans originated and purchased in the MA/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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: CALIFORNIA								Evaluation Period: July 25, 2008 to December 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
San Diego County AA	107	99.07	2.30	0.93	14.03	0.00	41.01	14.02	42.66	85.05	1.56	8.01	32.25	58.18
Limited Review:														
San Bernardino County AA	1	0.93	1.80	0.00	22.75	100.00	45.09	0.00	30.37	0.00	0.32	10.60	34.77	54.31

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: CALIFORNIA				Evaluation Period: January 1, 2010 to December 31, 2011			
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (percent) by Tract Income *								
	#	percent of Total**	percent of Businesses***	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	Low	Mod	Middle	Upper					
Full Review:																			
San Diego County AA	5	31.25	4.29	0.00	18.44	60.00	36.62	40.00	40.60	0.00	3.35	15.81	35.07	45.77					
Limited Review:																			
San Bernardino County AA	11	68.75	2.65	0.00	24.98	18.18	43.34	45.45	28.88	36.36	1.95	20.56	42.25	35.24					

* Based on 2011 Peer Small Business Data: US.

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

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CALIFORNIA								Evaluation Period: July 25, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
San Diego County AA	76	96.20	21.02	1.33	17.91	4.00	20.09	4.00	40.98	90.67	3.82	16.69	26.42	53.08
Limited Review:														
San Bernardino County AA	3	3.80	22.58	0.00	17.49	0.00	20.27	0.00	39.66	100.00	11.06	25.30	27.45	36.20

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: CALIFORNIA								Evaluation Period: July 25, 2008 to December 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
San Diego County AA	107	99.07	21.02	0.00	17.91	2.80	20.09	3.74	40.98	93.46	4.37	10.12	19.46	66.06
Limited Review:														
San Bernardino County AA	1	0.93	22.58	0.00	17.49	0.00	20.27	0.00	39.66	100.00	4.88	11.53	21.16	62.44

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: CALIFORNIA			Evaluation Period: January 1, 2010 to December 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 Million or Less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	percent of Total**	percent of Businesses**	percent BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Revenues \$1 Million or Less
Full Review:									
San Diego County AA	5	31.25	66.93	0.00	20.00	40.00	40.00	72,625	34.273
Limited Review:									
San Bernardino County AA	11	68.75	68.28	18.18	18.18	36.36	45.45	25,040	11,383

* Based on 2011 Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/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 - 2011).

**** 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 0.0% of small loans to businesses originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CALIFORNIA				Evaluation Period: August 19, 2008 to October 29, 2012			
MA/Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	percent of Total	#	\$(000's)
Full Review:									
San Diego County AA	0	0	1	1,155	1	1,155	100.00	0	0
Limited Review:									
San Bernardino County AA	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: CALIFORNIA																	
Evaluation Period: August 19, 2008 to October 29, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	percent of Rated Area Deposits in AA	# of BANK Branches	percent of Rated Area Branches in AA	Location of Branches by Income of Geographies (percent)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				percent of Population Within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
San Diego County AA	64.04 percent	1	50.00 percent	0	0	0	1	1	0	0	0	0	1	7.78	24.46	37.46	30.01
Limited Review:																	
San Bernardino County AA	35.96 percent	1	50.00 percent	0	0	0	1	1	1	0	0	-1	1	3.71	30.05	42.02	24.13

Tables of Performance Data

State of Colorado

Table 1. Lending Volume

LENDING VOLUME												Geography: COLORADO		Evaluation Period: April 1, 2008 to December 31, 2011	
MA/Assessment Area:	percent of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		percent of Rated Area Deposits in MA/AA ***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)				
Full Review:															
Greater Denver AA	86.27	380	124,190	16	2,353	0	0	0	0	396	126,543	86.71			
Limited Review:															
Boulder County AA	13.73	58	22,901	5	903	0	0	0	0	63	23,804	13.29			

* Loan Data as of December 31, 2011. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from August 19, 2008 to October 29, 2012.

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: COLORADO								Evaluation Period: April 1, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Greater Denver AA	78	82.98	2.38	3.85	19.72	11.54	38.22	29.49	39.68	55.13	3.49	17.24	34.51	44.76
Limited Review:														
Boulder County AA	16	17.02	0.27	0.00	19.36	12.50	44.99	31.25	35.39	56.25	0.51	18.99	46.00	34.50

* Based on 2011 Peer Mortgage Data: US.

** Home purchase loans originated and purchased in the MA/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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: COLORADO								Evaluation Period: April 1, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Greater Denver AA	6	85.71	2.38	0.00	19.62	0.00	38.22	33.33	39.68	66.67	3.17	17.34	32.76	46.73
Limited Review:														
Boulder County AA	1	14.29	0.27	0.00	19.36	0.00	44.99	0.00	35.39	100.00	0.00	16.10	47.94	35.96

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: COLORADO								Evaluation Period: April 1, 2008 to December 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Greater Denver AA	284	87.65	2.38	1.06	19.72	7.04	38.22	23.24	39.68	68.66	2.19	12.13	31.77	53.92
Limited Review:														
Boulder County AA	40	12.35	0.27	0.00	19.36	0.00	44.99	62.50	35.39	37.50	0.28	14.33	44.74	40.64

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: COLORADO								Evaluation Period: April 1, 2008 to December 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Greater Denver AA	1	50.00	8.27	0.00	37.41	0.00	44.63	100.00	9.70	0.00	15.11	36.98	39.55	8.36
Limited Review:														
Boulder County AA	1	50.00	5.73	0.00	38.53	0.00	42.03	100.00	13.71	0.00	12.20	56.10	29.27	2.44

* Based on 2011 Peer Mortgage Data: US.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: COLORADO				Evaluation Period: January 1, 2010 to December 31, 2011			
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (percent) by Tract Income *								
	#	percent of Total**	percent of Businesses***	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	Low	Mod	Middle	Upper					
Full Review:																			
Greater Denver AA	15	75.00	3.96	0.00	19.57	6.67	34.90	40.00	40.24	53.33	0.00	0.00	0.00	0.00					
Limited Review:																			
Boulder County AA	5	25.00	1.04	0.00	27.10	0.00	39.93	100.00	31.92	0.00	0.00	0.00	0.00	0.00					

* Based on 2011 Peer Small Business Data: US.

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

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: COLORADO								Evaluation Period: April 1, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families*	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Greater Denver AA	82	83.67	18.29	6.17	17.63	9.88	22.60	17.28	41.48	66.67	11.24	22.29	24.43	42.04
Limited Review:														
Boulder County AA	16	16.33	19.44	6.25	18.52	6.25	22.39	18.75	39.66	68.75	12.16	20.49	26.34	41.01

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: COLORADO								Evaluation Period: April 1, 2008 to December 31, 2011			
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Greater Denver AA	6	85.71	18.29	0.00	17.63	0.00	22.60	80.00	41.48	20.00	10.02	19.07	27.23	43.68
Limited Review:														
Boulder County AA	1	14.29	19.44	0.00	18.52	100.00	22.39	0.00	39.66	0.00	10.29	20.99	29.22	39.51

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 14.3% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: COLORADO								Evaluation Period: April 1, 2008 to December 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Greater Denver AA	291	87.92	18.29	5.57	17.63	16.03	22.60	18.12	41.48	60.28	6.54	15.34	24.13	53.99
Limited Review:														
Boulder County AA	40	12.08	19.44	2.50	18.52	12.50	22.39	22.50	39.66	62.50	9.22	17.51	25.87	47.40

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: COLORADO			Evaluation Period: January 1, 2010 to December 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 Million or Less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data *	
	#	percent of Total**	percent of Businesses**	percent BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Revenues \$1 Million or Less
Full Review:									
Greater Denver AA	16	76.19	68.46	43.73	62.50	18.75	18.75	0	0
Limited Review:									
Boulder County AA	5	23.81	68.45	40.00	80.00	0.00	20.00	0	0

* Based on 2011 Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/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 - 2011).

**** 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 28.57% of small loans to businesses originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: COLORADO				Evaluation Period: August 19, 2008 to October 29, 2012			
MA/Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	percent of Total	#	\$(000's)
Full Review:									
Greater Denver AA	0	0	2	2,818	2	2,818	91.77	0	0
Limited Review:									
Boulder County AA	0	0	1	253	1	253	8.23	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: COLORADO																	
Evaluation Period: August 19, 2008 to October 29, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	percent of Rated Area Deposits in AA	# of BANK Branches	percent of Rated Area Branches in AA	Location of Branches by Income of Geographies (percent)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				percent of Population Within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Greater Denver AA	86.71 percent	6	85.71 percent	0	0	1	5	1	1	0	-1	0	1	5.29	26.11	36.32	32.07
Limited Review:																	
Boulder County AA	13.29 percent	1	14.29 percent	0	0	1	0	0	0	0	0	0	0	3.35	25.38	41.56	29.70

Tables of Performance Data

State of Florida

Table 1. Lending Volume

LENDING VOLUME												
Geography: FLORIDA												
Evaluation Period: January 29, 2010 to December 31, 2011												
MA/Assessment Area:	percent of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		percent of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Collier County AA	95.47	489	238,512	17	3,493	0	0	0	0	506	242,005	88.52
Limited Review:												
Hillsborough County AA	4.53	18	11,744	4	590	0	0	2	4,269	24	16,603	11.48

* Loan Data as of December 31, 2011. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 29, 2010 to October 29, 2012.

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA								Evaluation Period: January 29, 2010 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Collier County	325	97.01	2.30	0.00	13.08	8.92	47.98	35.38	36.65	55.69	0.42	13.67	51.72	34.19
Limited Review:														
Hillsborough County AA	10	2.99	1.57	0.00	17.09	10.00	38.00	0.00	43.35	90.00	0.43	13.77	30.64	55.16

* Based on 2011 Peer Mortgage Data: US.

** Home purchase loans originated and purchased in the MA/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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA								Evaluation Period: January 29, 2010 to December 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Collier County AA	164	95.35	2.30	0.00	13.08	3.05	47.98	33.54	36.65	63.41	0.38	7.30	43.11	49.21
Limited Review:														
Hillsborough County AA	8	4.65	1.57	0.00	17.09	12.50	38.00	0.00	43.35	87.50	0.38	6.49	23.84	69.29

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA								Evaluation Period: January 29, 2010 to December 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (percent) by Tract Income *			
	#	percent of Total**	percent of Businesses***	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Collier County AA	17	80.95	1.46	0.00	10.63	11.76	44.78	29.41	43.14	58.82	0.76	8.10	43.61	47.51
Limited Review:														
Hillsborough County AA	4	19.05	2.83	0.00	21.53	50.00	30.62	25.00	45.02	25.00	2.78	21.21	28.42	47.60

* Based on 2011 Peer Small Business Data: US.

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

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA								Evaluation Period: January 29, 2010 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Collier County AA	325	97.01	19.06	4.00	19.32	9.23	20.65	9.23	40.97	77.54	12.98	17.32	14.59	55.11
Limited Review:														
Hillsborough County AA	10	2.99	18.55	0.00	17.07	0.00	20.67	0.00	43.71	100.00	6.09	20.03	23.39	50.49

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA								Evaluation Period: January 29, 2010 to December 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Collier County AA	164	85.35	19.06	4.27	19.32	6.10	20.65	8.54	40.97	81.10	5.42	12.19	18.72	63.68
Limited Review:														
Hillsborough County AA	8	4.65	18.55	0.00	17.07	0.00	20.67	12.50	43.71	87.50	3.64	9.86	16.97	69.53

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: FLORIDA			Evaluation Period: January 29, 2010 to December 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 Million or Less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data *	
	#	percent of Total**	percent of Businesses**	percent BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Revenues \$1 Million or Less
Full Review:									
Collier County AA	17	80.95	70.10	41.18	58.82	17.65	23.53	7,437	2,944
Limited Review:									
Hillsborough County AA	4	19.05	69.36	0.00	75.00	0.00	25.00	19,553	8,143

* Based on 2011 Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/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 - 2011).

**** 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 28.57% of small loans to businesses originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: FLORIDA				Evaluation Period: January 29, 2010 to October 29, 2012			
MA/Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	percent of Total	#	\$(000's)
Full Review:									
Collier County AA	0	0	4	45	4	45	94.07	0	0
Limited Review:									
Hillsborough County AA	0	0	1	3	1	3	5.93	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: FLORIDA																	
Evaluation Period: January 29, 2010 to October 29, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	percent of Rated Area Deposits in AA	# of BANK Branches	percent of Rated Area Branches in AA	Location of Branches by Income of Geographies (percent)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				percent of Population Within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Collier County AA	88.52 percent	2	66.67 percent	0	0	1	1	1	0	0	0	0	1	7.48	18.77	45.24	28.51
Limited Review:																	
Hillsborough County AA	11.48 percent	1	33.33 percent	0	0	1	0	1	0	0	0	1	0	4.58	21.52	36.64	37.26

Tables of Performance Data

State of Missouri

Table 1. Lending Volume

LENDING VOLUME												Geography: MISSOURI		Evaluation Period: June 30, 2011 to December 31, 2011	
MA/Assessment Area:	percent of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		percent of Rated Area Deposits in MA/AA ***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)				
Full Review:															
Kansas City AA	100.00	19	16,864	2	1,700	0	0	0	0	21	18,564	100.00			

* Loan Data as of December 31, 2011. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from June 30, 2011 to October 29, 2012.

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MISSOURI								Evaluation Period: June 30, 2011 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Kansas City AA	2	100.00	4.28	0.00	19.37	0.00	39.83	50.00	36.52	50.00	0.73	8.65	39.45	51.17

* Based on 2011 Peer Mortgage Data: US.

** Home purchase loans originated and purchased in the MA/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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MISSOURI								Evaluation Period: June 30, 2011 to December 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Kansas City AA	10	100.00	4.28	0.00	19.37	10.00	39.83	30.00	36.52	60.00	0.59	5.08	30.94	63.39

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MISSOURI								Evaluation Period: June 30, 2011 to December 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Kansas City AA	7	100.00	8.48	0.00	29.94	28.57	42.42	71.43	19.15	0.00	6.03	37.93	40.52	15.52

* Based on 2011 Peer Mortgage Data: US.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: MISSOURI								Evaluation Period: June 30, 2011 to December 31, 2011			
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (percent) by Tract Income *			
	#	percent of Total**	percent of Businesses***	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Kansas City AA	1	100.00	3.79	0.00	15.08	0.00	35.53	0.00	44.58	100.00	3.03	13.58	34.31	49.08

* Based on 2011 Peer Small Business Data: US.

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

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MISSOURI								Evaluation Period: June 30, 2011 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Kansas City AA	2	100.00	19.11	0.00	18.40	50.00	22.62	0.00	39.86	50.00	15.22	25.67	24.24	34.87

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MISSOURI						Evaluation Period: June 30, 2011 to December 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Kansas City AA	10	100.00	19.11	0.00	18.40	11.11	22.62	0.00	39.86	88.89	6.57	16.27	25.53	51.64

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 10.0% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: MISSOURI			Evaluation Period: June 30, 2011 to December 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 Million or Less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data *	
	#	percent of Total**	percent of Businesses**	percent BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Revenues \$1 Million or Less
Full Review:									
Kansas City AA	2	100.00	65.33	0.00	0.00	0.00	100.00	20,711	8,377

* Based on 2011 Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/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 - 2011).

**** 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 0.0% of small loans to businesses originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MISSOURI				Evaluation Period: June 30, 2011 to October 29, 2012			
MA/Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	percent of Total	#	\$(000's)
Full Review:									
Kansas City AA	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MISSOURI																	
Evaluation Period: June 30, 2011 to October 29, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	percent of Rated Area Deposits in AA	# of BANK Branches	percent of Rated Area Branches in AA	Location of Branches by Income of Geographies (percent)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				percent of Population Within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Kansas City AA	100.00 percent	1	100.00 percent	0	0	1	0	1	0	0	0	1	0	6.75	23.33	38.41	31.48

Tables of Performance Data

State of Nebraska

Table 1. Lending Volume

LENDING VOLUME		Geography: NEBRASKA						Evaluation Period: April 1, 2008 to December 31, 2011				
MA/Assessment Area:	percent of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		percent of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Lancaster County AA	55.01	3,725	570,535	26	5,436	0	0	4	7,175	3,751	583,146	12.19
Omaha AA	44.99	2,824	555,867	243	40,558	0	0	4	53,562	3,067	649,987	87.81

* Loan Data as of December 31, 2011. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from August 19, 2008 to October 29, 2012.

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NEBRASKA								Evaluation Period: April 1, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Lancaster County AA	574	52.52	0.63	1.05	13.30	8.54	55.94	45.99	30.13	44.43	0.65	9.90	52.55	36.90
Omaha AA	519	47.48	1.31	0.77	18.58	8.67	46.71	40.45	33.39	50.10	0.48	8.53	44.61	46.38

* Based on 2011 Peer Mortgage Data: US.

** Home purchase loans originated and purchased in the MA/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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: NEBRASKA								Evaluation Period: April 1, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Lancaster County AA	43	34.40	0.63	0.00	13.30	0.00	55.94	44.19	30.13	55.81	0.86	10.81	50.00	38.33
Omaha AA	82	65.60	1.31	1.22	18.58	18.29	46.71	47.56	33.39	32.93	1.08	14.04	44.56	40.31

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: NEBRASKA								Evaluation Period: April 1, 2008 to December 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Lancaster County AA	3,085	58.37	0.63	0.19	13.30	3.92	55.94	36.76	30.13	59.12	0.49	7.61	48.00	43.89
Omaha AA	2,200	41.63	1.31	0.45	18.58	3.73	46.71	32.59	33.39	63.23	0.27	6.44	40.02	53.28

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: NEBRASKA								Evaluation Period: April 1, 2008 to December 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Lancaster County AA	19	45.24	14.43	21.05	32.89	47.37	35.27	31.58	17.41	0.00	21.43	53.57	22.32	2.68
Omaha AA	23	54.76	2.05	0.00	29.29	47.83	52.84	34.78	15.82	17.39	0.92	55.05	37.61	6.42

* Based on 2011 Peer Mortgage Data: US.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: NEBRASKA				Evaluation Period: January 1, 2010 to December 31, 2011			
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (percent) by Tract Income *								
	#	percent of Total**	percent of Businesses***	percent BANK Loans	percent of Businesses*	percent BANK Loans	percent of Businesses*	percent BANK Loans	percent of Businesses**	percent BANK Loans	Low	Mod	Middle	Upper					
Full Review:																			
Lancaster County AA	26	9.67	2.05	7.69	23.20	19.23	42.12	34.62	31.65	38.46	1.45	23.29	41.50	33.76					
Omaha AA	243	90.33	1.90	1.65	16.39	15.64	43.61	44.03	38.10	38.68	1.21	14.22	44.06	40.51					

* Based on 2011 Peer Small Business Data: US.

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

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEBRASKA								Evaluation Period: April 1, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Lancaster County AA	574	52.52	17.18	9.21	19.02	26.17	26.09	29.42	37.71	35.20	14.65	28.01	26.92	30.42
Omaha AA	519	47.48	17.04	5.70	18.37	20.37	23.98	23.83	40.62	50.10	11.60	25.60	26.50	36.29

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 4.4% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: NEBRASKA				Evaluation Period: April 1, 2008 to December 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Lancaster County AA	43	34.40	17.18	9.52	19.02	9.52	26.09	28.57	37.71	52.38	11.15	19.50	30.65	38.70
Omaha AA	82	65.60	17.04	2.60	18.37	16.88	23.98	22.08	40.62	58.44	11.59	21.91	25.30	41.20

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 4.8% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: NEBRASKA										Evaluation Period: April 1, 2008 to December 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*				
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper	
Full Review:															
Lancaster County AA	3,089	58.40	17.18	4.53	19.02	14.78	26.09	24.43	37.71	56.26	6.94	19.57	27.40	46.09	
Omaha AA	2,200	41.60	17.04	2.80	18.37	8.74	23.98	18.52	40.62	69.94	7.03	16.96	24.26	51.76	

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.6% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: NEBRASKA			Evaluation Period: January 1, 2010 to December 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 Million or Less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data *	
	#	percent of Total**	percent of Businesses**	percent BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Revenues \$1 Million or Less
Full Review:									
Lancaster County AA	26	9.67	66.87	57.69	42.31	30.77	26.92	4,542	2,326
Omaha AA	243	90.33	66.36	44.03	61.32	18.93	19.75	10,399	4,772

* Based on 2011 Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/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 - 2011).

**** 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 7.81% of small loans to businesses originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEBRASKA				Evaluation Period: August 19, 2008 to October 29, 2012			
MA/Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	percent of Total	#	\$(000's)
Full Review:									
Lancaster County AA	0	0	0	0	0	0	0.00	0	0
Omaha AA	0	0	44	2,673	44	2,673	100.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: NEBRASKA																	
Evaluation Period: August 19, 2008 to October 29, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	percent of Rated Area Deposits in AA	# of BANK Branches	percent of Rated Area Branches in AA	Location of Branches by Income of Geographies (percent)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				percent of Population Within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Lancaster County AA	12.19 percent	2	28.57 percent	0	1	0	1	0	0	0	0	0	0	3.32	21.12	49.31	24.05
Omaha AA	87.81 percent	5	71.43 percent	0	1	2	2	1	0	0	0	0	1	2.57	25.11	43.94	28.37

Tables of Performance Data

State of Nevada

Table 1. Lending Volume

LENDING VOLUME												
Geography: NEVADA												
Evaluation Period: July 25, 2008 to December 31, 2011												
MA/Assessment Area:	percent of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		percent of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Clark County AA	37.13	93	31,394	57	12,047	0	0	0	0	150	43,441	66.55
Limited Review:												
Carson City AA	1.73	1	400	6	1,216	0	0	0	0	7	1,616	10.48
Washoe County AA	61.14	70	21,113	177	9,157	0	0	0	0	247	30,270	22.97

* Loan Data as of December 31, 2011. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from August 19, 2008 to October 29, 2012.

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: NEVADA								Evaluation Period: July 25, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Clark County AA	47	52.81	0.39	0.00	16.32	2.13	44.57	44.68	38.72	53.19	0.15	3.80	43.21	52.84
Limited Review:														
Carson City AA	0	0.00	0.00	0.00	6.70	0.00	68.56	0.0	24.74	0.00	0.00	7.72	70.20	22.09
Washoe County AA	42	47.19	0.99	0.00	16.60	0.00	43.47	23.81	38.95	76.19	0.15	7.89	44.30	47.66

* Based on 2011 Peer Mortgage Data: US.

** Home purchase loans originated and purchased in the MA/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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: NEVADA								Evaluation Period: July 25, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Clark County AA	1	33.33	0.39	0.00	16.32	100.00	44.57	0.00	38.72	0.00	0.23	7.23	40.56	51.98
Limited Review:														
Carson City AA	0	0.00	0.00	0.00	6.70	0.00	68.56	0.00	24.74	0.00	0.00	14.29	28.57	57.14
Washoe County AA	2	66.67	0.99	0.00	16.60	0.00	43.47	0.00	38.95	100.00	0.67	7.33	34.00	58.00

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: NEVADA				Evaluation Period: July 25, 2008 to December 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Clark County AA	41	61.19	0.39	0.00	16.32	2.44	44.57	29.27	38.72	68.29	0.13	3.96	36.88	59.04
Limited Review:														
Carson City AA	1	1.49	0.00	0.00	6.70	0.00	68.56	0.00	24.74	100.00	0.00	5.80	58.02	36.18
Washoe County AA	25	37.31	0.99	0.00	16.60	0.00	43.47	16.00	38.95	84.00	0.24	5.91	32.06	61.79

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: NEVADA								Evaluation Period: July 25, 2008 to December 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Clark County AA	4	80.00	5.44	0.00	45.33	50.00	37.71	25.00	11.53	25.00	5.41	37.84	43.24	13.51
Limited Review:														
Carson City AA	0	0.00	0.00	0.00	23.09	0.00	63.04	0.00	13.87	0.00	0.00	50.00	50.00	0.00
Washoe County AA	1	20.00	11.65	0.00	53.61	0.00	24.69	100.00	10.05	0.00	5.56	66.67	27.78	0.00

* Based on 2011 Peer Mortgage Data: US.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: NEVADA								Evaluation Period: January 1, 2010 to December 31, 2011				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (percent) by Tract Income *			
	#	percent of Total**	percent of Businesses***	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Clark County AA	57	23.75	2.24	0.00	17.24	12.28	37.56	42.11	42.56	45.61	2.04	12.27	35.79	49.90
Limited Review:														
Carson City AA	6	2.50	0.00	0.00	13.04	0.00	70.05	83.33	16.90	16.67	0.00	9.50	68.40	22.09
Washoe County AA	177	73.75	2.48	2.26	33.85	90.96	29.47	4.52	34.20	2.26	1.69	30.73	27.17	40.41

* Based on 2011 Peer Small Business Data: US.

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

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: NEVADA								Evaluation Period: July 25, 2008 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Clark County AA	47	52.81	18.69	4.35	18.74	13.04	23.47	28.26	39.10	54.35	15.02	25.26	23.60	36.12
Limited Review:														
Carson City AA	0	0.00	18.53	0.00	18.74	0.00	22.28	0.00	40.45	0.00	22.58	26.25	23.75	27.42
Washoe County AA	42	47.19	19.17	2.38	18.84	9.52	23.06	7.14	38.94	80.95	18.96	25.74	22.64	32.65

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: NEVADA								Evaluation Period: July 25, 2008 to December 31, 2011			
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Clark County AA	1	33.33	18.69	0.00	18.74	100.00	23.47	0.00	39.10	0.00	11.28	17.18	27.95	43.59
Limited Review:														
Carson City AA	0	0.00	18.53	0.00	18.74	0.00	22.28	0.00	40.45	0.00	28.57	14.29	14.29	42.86
Washoe County AA	2	66.67	19.17	0.00	18.84	0.00	23.06	0.00	38.94	100.00	13.77	18.84	20.29	47.10

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: NEVADA				Evaluation Period: July 25, 2008 to December 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Clark County AA	41	61.19	18.69	2.56	18.74	12.82	23.47	15.38	39.10	69.23	8.37	16.52	22.49	52.61
Limited Review:														
Carson City AA	1	1.49	18.53	0.00	18.74	0.00	22.28	0.00	40.45	100.00	9.07	17.09	26.37	47.47
Washoe County AA	25	37.31	19.17	0.00	18.84	8.00	23.06	12.00	38.94	80.00	7.58	15.30	21.67	55.45

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: NEVADA			Evaluation Period: January 1, 2010 to December 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 Million or Less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data *	
	#	percent of Total**	percent of Businesses**	percent BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Revenues \$1 Million or Less
Full Review:									
Clark County AA	57	23.75	67.00	33.33	50.88	21.05	28.07	30,540	14,829
Limited Review:									
Carson City AA	6	2.50	67.07	66.67	50.00	16.67	33.33	1,672	872
Washoe County AA	177	73.75	68.20	7.34	90.96	3.95	5.08	10,282	5,218

* Based on 2011 Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/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 - 2011).

**** 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 4.58% of small loans to businesses originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEVADA				Evaluation Period: August 19, 2008 to October 29, 2012			
MA/Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	percent of Total	#	\$(000's)
Full Review:									
Clark County AA	0	0	3	1,939	3	1,939	61.16	0	0
Limited Review:									
Carson City AA	0	0	0	0	0	0	0.00	0	0
Washoe County AA	0	0	2	1,231	2	1,231	38.84	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: NEVADA																	
Evaluation Period: August 19, 2008 to October 29, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	percent of Rated Area Deposits in AA	# of BANK Branches	percent of Rated Area Branches in AA	Location of Branches by Income of Geographies (percent)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				percent of Population Within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Clark County AA	66.55 percent	5	62.50 percent	0	2	1	2	2	3	0	0	0	-1	2.05	27.84	41.73	28.38
Limited Review:																	
Carson City AA	10.48 percent	1	12.50 percent	0	0	1	0	0	0	0	0	0	0	0.00	11.55	66.93	21.52
Washoe County AA	22.97 percent	2	25.00 percent	0	2	0	0	0	1	0	-1	0	0	3.65	29.63	39.48	27.25

Tables of Performance Data

State of Texas

Table 1. Lending Volume

LENDING VOLUME												
Geography: TEXAS												
Evaluation Period: October 22, 2009 to December 31, 2011												
MA/Assessment Area:	percent of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		percent of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Dallas County AA	69.70	171	93,935	34	8,334	0	0	2	3,021	205	105,290	65.40
Limited Review:												
Harris County AA	30.30	66	71,782	24	8,717	0	0	0	0	90	80,499	34.60

* Loan Data as of December 31, 2011. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from October 22, 2009 to October 29, 2012.

*** Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: TEXAS								Evaluation Period: October 22, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Dallas County AA	80	68.38	4.24	0.00	29.53	3.75	35.01	23.75	31.22	72.50	1.96	18.82	36.39	42.84
Limited Review:														
Harris County AA	37	31.62	3.94	2.70	25.93	5.41	30.45	16.22	39.67	75.68	2.06	11.30	35.36	51.29

* Based on 2011 Peer Mortgage Data: US.

** Home purchase loans originated and purchased in the MA/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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: TEXAS								Evaluation Period: October 22, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Dallas County AA	1	100.00	4.24	0.00	29.53	0.00	35.01	0.00	31.22	100.00	2.44	16.04	32.65	48.87
Limited Review:														
Harris County AA	0	0.00	3.94	0.00	25.93	0.00	30.45	0.00	39.67	0.00	2.42	16.71	28.06	52.81

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: TEXAS								Evaluation Period: October 22, 2009 to December 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	percent Owner Occupied Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Dallas County AA	87	78.38	4.24	0.00	29.53	2.30	35.01	9.20	31.22	88.51	1.27	11.02	30.45	57.27
Limited Review:														
Harris County AA	24	21.62	3.94	0.00	25.93	12.50	30.45	8.33	39.67	79.17	1.82	9.23	26.28	62.67

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: TEXAS								Evaluation Period: October 22, 2009 to December 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (percent) by Tract Income*			
	#	percent of Total**	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	percent of Multi-Family Units***	percent BANK Loans	Low	Mod	Middle	Upper
Full Review:														
Dallas County AA	3	37.50	18.13	33.33	36.96	66.67	30.79	0.00	14.12	0.00	19.73	36.05	30.61	13.61
Limited Review:														
Harris County AA	5	62.50	10.57	20.00	36.04	40.00	31.18	40.00	22.22	0.00	13.42	35.57	34.90	16.11

* Based on 2011 Peer Mortgage Data: US.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of Multifamily Units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: TEXAS				Evaluation Period: January 1, 2010 to December 31, 2011			
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (percent) by Tract Income *								
	#	percent of Total**	percent of Businesses***	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	percent of Businesses**	percent BANK Loans	Low	Mod	Middle	Upper					
Full Review:																			
Dallas County AA	33	57.89	5.26	0.00	27.40	60.61	32.82	15.15	32.66	24.24	4.67	27.26	32.21	35.85					
Limited Review:																			
Harris County AA	24	42.11	4.74	0.00	23.87	4.17	27.71	16.67	43.42	79.17	4.35	23.74	26.48	45.42					

* Based on 2011 Peer Small Business Data: US.

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

*** Source Data - Dun and Bradstreet (2011).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: TEXAS								Evaluation Period: October 22, 2009 to December 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Dallas County AA	80	68.38	26.10	0.00	20.12	5.00	20.22	2.50	33.56	92.50	12.33	23.79	19.56	44.32
Limited Review:														
Harris County AA	37	31.62	24.35	5.41	17.94	0.00	18.71	0.00	39.00	94.59	7.08	21.99	22.46	48.47

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by Bank.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: TEXAS										Evaluation Period: October 22, 2009 to December 31, 2011			
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*				
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper	
Full Review:															
Dallas County AA	1	100.00	26.10	0.00	20.12	0.00	20.22	0.00	33.56	100.00	9.07	16.43	18.75	55.75	
Limited Review:															
Harris County AA	0	0.00	24.35	0.00	17.94	0.00	18.71	0.00	39.00	0.00	6.34	12.67	19.38	61.61	

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by Bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: TEXAS								Evaluation Period: October 22, 2009 to December 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	percent of Total**	percent Families**	percent BANK Loans***	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	percent Families***	percent BANK Loans****	Low	Mod	Middle	Upper
Full Review:														
Dallas County AA	87	78.38	26.10	1.18	20.12	1.18	20.22	3.53	33.56	94.12	4.60	11.70	18.19	65.51
Limited Review:														
Harris County AA	24	21.62	24.35	0.00	17.94	0.00	18.71	4.17	39.00	95.83	3.11	9.72	17.49	69.67

* Based on 2011 Peer Mortgage Data: US.

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

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.8% of loans originated and purchased by Bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: TEXAS			Evaluation Period: January 1, 2010 to December 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 Million or Less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data *	
	#	percent of Total**	percent of Businesses**	percent BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Revenues \$1 Million or Less
Full Review:									
Dallas County AA	34	58.62	65.30	44.12	44.12	17.65	38.24	42,440	16,921
Limited Review:									
Harris County AA	24	41.38	66.46	58.33	37.50	25.00	37.50	76,920	29,294

* Based on 2011 Peer Small Business Data: US.

** Small loans to businesses originated and purchased in the MA/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 - 2011).

**** 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 10.34% of small loans to businesses originated and purchased by the Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: TEXAS				Evaluation Period: October 22, 2009 to October 29, 2012			
MA/Assessment Area:	Prior Period Investments *		Current Period Investments		Total Investments			Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	percent of Total	#	\$(000's)
Full Review:									
Dallas County AA	0	0	1	744	1	744	36.96	0	0
Limited Review:									
Harris County AA	0	0	1	1,269	1	1,269	63.04	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: TEXAS																	
Evaluation Period: October 22, 2009 to October 29, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	percent of Rated Area Deposits in AA	# of BANK Branches	percent of Rated Area Branches in AA	Location of Branches by Income of Geographies (percent)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				percent of Population Within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Dallas County AA	65.40 percent	2	50.00 percent	0	0	0	2	2	0	0	0	0	2	11.31	37.04	30.75	20.90
Limited Review:																	
Harris County AA	34.60 percent	2	50.00 percent	0	0	0	2	2	0	0	0	0	2	8.24	33.98	29.11	28.60

