

PUBLIC DISCLOSURE

June 21, 2010

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Connecticut Bank and Trust Company

58 State House Square
Hartford, Connecticut 06103

Federal Reserve Bank of Boston
600 Atlantic Avenue
Boston, Massachusetts 02210

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, nor should it 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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INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Connecticut Bank and Trust Company (CBT or the bank) demonstrated a satisfactory record of helping to meet its assessment area's credit needs in a manner consistent with its resources and capabilities. The factors supporting the bank's overall rating include the following findings:

- The bank's small business loans originated inside its assessment area (AA) is adequate with 67.0 percent by number and 64.6 percent by dollar volume.
- The level of lending to businesses of different sizes is reasonable, based on gross annual revenue and loan amount.
- The bank's lending patterns for small business loans revealed that 27.5 percent were originated in low- and moderate-income census tracts. Considering the level of businesses in those geographies, and the bank's performance versus the aggregate, this performance is strong.
- The bank's average net loan-to-deposit (LTD) ratio has significantly increased since the last examination. Despite fluctuations in the ratios, the average net loan-to-deposit ratio for the past 17 quarters was 102.6 percent, which is considered to be more than reasonable.
- No CRA-related complaints have been received and no evidence of discriminatory acts or practices was noted during this evaluation.

Scope of Evaluation

CBT's Community Reinvestment Act (CRA) performance review was based on CRA activities conducted within its assessment area using the Federal Financial Institutions Examination Council's (FFIEC) Interagency Procedures and Guidelines for Small Institutions. These procedures evaluate the bank's efforts in meeting the credit needs of its AA under the following five-part criteria: loan-to-deposit ratio, lending in the AA, lending to borrowers of different incomes, geographic distribution of loans, and record on taking action in response to consumer complaints.

As CBT is a commercial bank, nonfarm nonresidential and commercial and industrial loans are the bank's primary line of business. Under small institution examination guidelines, CBT is not required to collect small business loan data. However, management has decided to collect this data for internal tracking purposes. As this data was available to examiners, an evaluation was performed of all commercial loan activity from January 1, 2007 through December 31, 2009, including loans secured by nonfarm nonresidential real estate, and commercial and industrial loans. In addition, the bank is also subject to the reporting requirements of the Home Mortgage Disclosure Act (HMDA). CBT's volume of residential loan originations, however, is far less significant than commercial loans. Therefore a less intensive analysis was performed for residential lending for the years 2006 through 2009. Commercial loan data were obtained directly from CBT, while residential loan data were derived from the Federal Reserve System's CRA/HMDA Data Analysis Tool (CHAT). Market information for 2009 commercial lending aggregate data was obtained from CHAT and was the most recent data available as of the examination date.

Analysis of the bank's loans to deposits incorporated 17 quarters from March 31, 2006 through March 31, 2010, and represents the period since the prior examination.

Based on 2000 US Census data, 13.9 percent and 41.5 percent of the owner-occupied housing units within the bank's AA are located in the low- and moderate-income census tracts respectively. In contrast, 73.1 percent and 52.7 percent of rental units are located respectively in those same tracts. Further, 46.3 percent of families living below the poverty level reside in the low- and moderate-income tracts. These percentages show that lending opportunities for residential mortgages in the low- and moderate-income census tracts are fairly limited.

There are 21 major financial institutions competing in the bank's AA according to the Federal Deposit Insurance Corporation (FDIC) Summary of Deposits. CBT is a leading lender of commercial loans in the Hartford area. According to the bank's management, CBT is also the fastest growing institution in Connecticut.¹

¹ CBT Press Release: January 26, 2010

This performance evaluation is an assessment of the bank's CRA performance by the Federal Reserve Bank of Boston. The examination takes into consideration CBT's financial capacity, legal impediments, local economic conditions, demographics and the competitive market in which it operates. There are no legal or financial impediments that would impact the bank's ability to lend.

CBT was last examined by the Federal Reserve Bank of Boston for compliance with the CRA on May 1, 2006 under the small institution performance standards. That examination resulted in a "Satisfactory" rating.

Performance Context

DESCRIPTION OF INSTITUTION

CBT was founded on March 12, 2004 as a full-service commercial banking institution headquartered at 58 State House Square, Hartford, Connecticut. Since the last CRA examination dated May 1, 2006, the bank has increased its branch offices from three to six which include the following: 68 South Main Street in West Hartford, 7 Sycamore Street in Glastonbury, 435 Hartford Turnpike in Vernon, 66 Cedar Street in Newington, 396 Cromwell Avenue in Rocky Hill, and 148 Broad Street in Windsor. The main office branch is located in a low-income census tract, while the six other branches are located in middle-income census tracts. Further, while examiners were onsite, CBT opened its eighth full-service branch office at the Saint Francis Hospital complex located in a low-income census tract at 114 Woodland Street in Hartford. This new facility will offer banking and financial services primarily to the medical staff and vendors working at the hospital and the adjacent medical office building.

All of the branches have full-service automated teller machines (ATM). All branches, with the exception of the main office, Windsor office, and the new branch at Saint Francis Hospital have drive-up facilities. The bank participates in the SUM network, a program designed to help consumers minimize the costs associated with using their ATM cards. CBT's hours of operation are convenient to its customers.

CBT offers a variety of credit products to meet its community credit needs. As mentioned earlier, CBT's primary focus is small business and commercial real estate lending, although the bank also offers personal and automobile loans, and home equity lines of credit. Other retail services available include free consumer checking and free business checking accounts.

Since its inception in 2004, the bank has partnered with mortgage companies as a means to provide 1-4 family residential mortgages to its customers.² In 2006, CBT's

² CBT does originate and hold its own multi-family residential mortgages, however, these are also a small proportion of the bank's overall lending.

mortgage partner, ABN AMRO, discontinued entirely its business operations nationwide. The same year CBT chose Family Choice Mortgage to be its mortgage provider, a relationship that lasted through 2007. In 2008, CBT entered into an agreement with Taylor, Bean & Whitaker (TBW) to assist with the bank's 1-4 family mortgage originations. With TBW's bankruptcy in 2009, the bank now partners with Crescent Mortgage and Flagstar Bank in order to continue to offer mortgage loans. While this opportunity is available for customers, the volume of mortgage loan originations is not significant.

In its efforts to meet credit needs in disadvantaged geographies, the bank has successfully leveraged its resources by teaming with government-backed loan programs such as the Hartford Community Loan Fund, the Connecticut Development Authority, and the Small Business Administration (see descriptions on page16).

Based on the March 31, 2010 Report of Condition and Income (Call Report) data, the bank's assets had increased by 175.2 percent from \$96.9 million since the last CRA exam to \$266.7 million in the first quarter of 2010. During the same time period, total loans outstanding increased by 259.4 percent from \$57.1 million to \$205.2 million, and total deposits increased by 193.9 percent from \$70.7 million to \$207.8 million. These are significant increases and demonstrate CBT's proactive lending efforts. In fact, during the current recession, community banks such as CBT have been credited with keeping credit flowing to the market.³

The following table illustrates the composition of the loan portfolio as of March 31, 2010, based on the Call Report:

Type of Loans	\$(000)	% Total
Construction & Land Development	12,669	6.2
1-4 Family		
a. First Mortgages	8,982	4.4
b. Home Equity Lines	7,795	3.8
c. Junior Liens (Second Mortgages)	5,178	2.5
Multifamily	14,084	6.9
Commercial Loans		
a. Commercial Real Estate	98,485	48.0
b. Commercial & Industrial Loans	51,166	24.9
Farm and Farm Related	4,289	2.1

³ Hartford Business Journal, December 21, 2009

Consumer	2,525	1.2
Other Loans	55	0.0
Total Gross Loans	205,228	100

Source: Consolidated Report of Condition and Income, 03/31/10

The above table indicates 72.9 percent of the portfolio consisted primarily of commercial loans, which is consistent with the bank's strategy to remain a commercial lender.

DESCRIPTION OF ASSESSMENT AREA

Overview

The CRA requires a financial institution to identify an AA where it focuses its lending efforts. CBT defines its AA as the following cities and towns: Avon, Bloomfield, East Hartford, Farmington, Glastonbury, Hartford, Manchester, Newington, Rocky Hill, South Windsor, West Hartford, Wethersfield, and Windsor (all located in Hartford County), Bolton, Ellington, Tolland, and Vernon (all located in Tolland County). Both counties are part of the Hartford-West Hartford-East Hartford, CT Metropolitan Statistical Area (MSA).

The AA consists of 150 census tracts: 30 of which are classified as low-income, 29 as moderate-income, 51 as middle-income, 39 as upper-income, and 1 with no income designation. This non-designated area is known as the North Meadows. It is a largely commercial and industrial area that is home to many of the area's automobile dealerships. The AA meets the legal requirements of the regulation, and does not arbitrarily exclude any low- or moderate-income areas.

The majority of the low- and moderate-income census tracts in the AA are located in the City of Hartford where CBT maintains its main office. CBT also holds the advantage of being the only Connecticut-based bank to have its headquarters located in the capital city. As indicated in the Scope of Examination, mortgage lending opportunities are relatively limited in the low- and moderate-income tracts as there is a low percentage of 1-4 family owner occupied dwellings. However, small business and multi-family residential opportunities do exist in the greater Hartford area.

Demographic Data by Census Tract

The following table provides demographic information for CBT's AA:

Table 2 - Assessment Area Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	30	20.0	19,053	13.0	6,554	34.4	33,481	22.8
Moderate-income	29	19.3	24,626	16.8	2,932	11.9	25,177	17.1
Middle-income	51	34.0	53,464	36.4	1,637	3.1	31,526	21.5
Upper-income	39	26.0	49,691	33.8	788	1.0	56,650	38.6
Unknown-income	1	0.7	0	0.0	0	0.0	0	0.0
Total Assessment Area	150	100.0	146,834	100.0	11,911	8.1	146,834	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	36,628	5,083	3.7	13.9	26,765	73.1	4,780	13.1
Moderate-income	44,431	18,423	13.3	41.5	23,418	52.7	2,590	5.8
Middle-income	85,257	58,159	41.9	68.2	24,282	28.5	2,816	3.3
Upper-income	69,923	57,097	41.1	81.7	10,802	15.4	2,024	2.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	236,239	138,762	100.0	58.7	85,267	36.1	12,210	5.2
	Total Businesses by Tract	Business by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low-income	3,826	12.5	3,173	11.9	315	14.0	338	19.8
Moderate-income	4,773	15.6	4,013	15.0	424	18.8	336	19.7
Middle-income	11,537	37.6	10,041	37.6	896	39.7	600	35.2
Upper-income	10,436	34.0	9,427	35.3	593	26.3	416	24.4
Unknown-income	106	0.3	63	0.2	28	1.2	15	0.9
Total Assessment Area	30,678	100.0	26,717	100.0	2,256	100.0	1,705	100.0
	Percentage of Total Businesses:			87.1		7.4		5.6

Population

Based on 2000 US Census data, the AA has a population of 568,140. Of this total, 15.1 percent reside in low-income tracts, 18.1 percent in moderate-income tracts, 35.2 percent in middle-income tracts, and 31.5 percent in upper-income tracts. The population is comprised of 224,077 households. The income distribution of these households by tract is: 25.7 percent located in low-income tracts, 16.6 percent in moderate-income tracts, 18.1 percent in middle-income tracts, and 39.6 percent in upper-income tracts.

Income Characteristics

The 2000 U.S. Census data reveals that there are 146,834 families in the AA. Of these, 22.8 percent are low-income, 17.0 percent are moderate-income, 21.5 percent are middle-income, 38.6 percent are upper-income, and 8.1 percent live below the poverty level. The 2009 median family income in the AA is \$62,460, which is close to that of the State of Connecticut at \$65,521. The Department of Housing and Urban Development (HUD) estimated 2009 median family income for the Hartford-West Hartford-East Hartford MSA to be \$85,100.

Housing Characteristics

According to 2000 U.S. Census data, 58.7 percent of the AA's housing stock comprised owner-occupied units with a median age of 40 years. Also, 58.7 percent of the housing units are one-unit detached dwellings. The median housing value in the AA is \$146,003, which is at par with the median housing value for the MSA at \$146,331 but lower than the median value for the State of Connecticut at \$160,600.

Business Characteristics and Employment Statistics

Based on 2009 Dun and Bradstreet data, there are approximately 30,678 businesses located within CBT's AA. Small businesses prevail as 87.1 percent had total revenues equal to or less than \$1 million. As shown in Table 2, there are lending opportunities in all the geographies of the AA.

The economy of the bank's AA is primarily tied to the economy of the greater Hartford area. Employment opportunities are varied and major employers in the Hartford area include insurance companies, high-tech manufacturing firms, health care, and retail. However, the nationwide economic downturn has negatively affected the bank's AA. Since the previous CRA exam of CBT, the economy in the AA has weakened as indicated by the unemployment data in the table below. In fact, Table 3 shows unemployment percentages have doubled from 2006 to 2010 in the towns and cities of

the AA. Despite these data, the Connecticut economy seems to have rebounded in the first quarter of 2010 with positive signs posted in key sectors such as housing, banking, and manufacturing.⁴

Area	March 2010 Unemployment rate	March 2009 Unemployment rate	March 2006 Unemployment rate
Avon	6.0	5.1	2.9
Bloomfield	10.1	8.3	5.4
Bolton	7.2	6.7	3.2
East Hartford	11.7	10.5	5.9
Ellington	8.3	7.0	4.1
Farmington	7.1	5.9	3.5
Glastonbury	6.4	5.1	3.0
Hartford	16.0	13.9	9.2
Manchester	8.6	7.6	4.4
Newington	8.7	7.0	4.0
Rocky Hill	7.4	6.6	3.7
South Windsor	7.2	5.7	3.3
Tolland	6.7	5.9	3.3
Vernon	9.0	7.6	4.4
West Hartford	8.0	6.6	3.6
Wethersfield	9.0	7.3	4.4
Windsor	9.1	7.1	4.2
Connecticut	9.2	8.0	4.5

Source: 2006, 2009, March 2010 Connecticut Department of Labor Statistics

Competition

According to the FDIC's Summary of Deposits June as of 30, 2009, CBT was ranked 13th for total deposits with a market share of 0.80 percent. The bank operates in a highly competitive market with 21 banks operating 191 offices within the AA. Many of the institutions are statewide or multi-regional and include Bank of America NA, Rockville Bank, Peoples United Bank, Webster Bank National, NewAlliance Bank, Farmington Savings Bank, Simsbury Bank and Trust Company, and Webster Bank National Association, and many others. These banks have a strong presence in the communities in which they maintain branch offices, including communities in CBT's AA.

Community Contacts

As part of the examination, information was obtained from the community development

⁴ Hartford Business Journal, May 17, 2010

department office of one of the towns in the bank's AA regarding local economic conditions and community credit needs. The contact stated that the influx of banks into the community is indicative of the credit needs and opportunities in the business sector. The contact further deplored, with great emphasis, the lack of attention by creditors to the strong agricultural sector. The contact had positive comments regarding the degree of involvement of certain financial institutions in the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Loan-to-Deposit Ratio

This performance category evaluates a small bank's net loan-to-deposit ratio. This ratio shows the percentage of the bank's deposit base that is reinvested in loans and is a measure of the bank's willingness to extend credit. The bank's average LTD ratio is more than reasonable based on the level and trend of the LTD ratio and a peer comparison.

To account for seasonal variations or other anomalies, the average net LTD ratio was calculated using the LTD ratios for the last 17 quarters. This period falls within the economic downturn affecting the whole country and has caused the LTD ratios to fluctuate for most institutions. In spite of these fluctuations, CBT has experienced significant growth in deposits and loans⁵ since its inception in 2004. The bank's net LTD ratio increased from 46.0 percent in December 2005 as a de novo bank to the current 97.4 percent as of March 2010.

Institution	Total Assets (000s)*	Average Loan-to-Deposit Ratio**	Net Loan-to-Deposit Ratio*
Connecticut Bank and Trust Company	266.7	102.6	97.4
Rockville Bank	1,560.5	115.3	119.2
Simsbury Bank and Trust Company	282.5	79.7	75.8
Farmington Savings Bank	1,301.7	87.8	99.2

*Source: UBPR, As of 3/31/10

**Source: UBPR, 3/31/2006 through 3/31/2010

The average LTD ratios of three other competitors operating in the bank's AA were also considered over the same time period to further evaluate the reasonableness of CBT's

⁵ See Performance Context

ratios. As shown above in Table 4, the bank's average and net LTD ratios are considered more than reasonable compared to its competitors.

Assessment Area Concentration

This performance category measures CBT's record of lending within its AA. As shown in Table 5 below, 66.7 percent of the total number of loans and 63.8 percent of the total dollar amount of loans originated represent a majority of the bank's lending within the AA. These percentages show a reasonable level of lending considering the economic downturn which caused lower loan demand during the period reviewed.

Table 5 - Lending Inside and Outside the Assessment Area										
Loan Type	Number of Loans					Dollar of Loans (000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Commercial Loans	382	67.0	188	33.0	570	134,760	64.6	73,726	35.4	208,486
Residential Loans	31	63.3	18	36.7	49	9,332	54.1	7,909	45.9	17,241
Total	413	66.7	206	33.3	619	144,092	63.8	81,635	36.2	225,727

Source: 2007 - 2009 Bank Commercial Lending Data, 2006 - 2009 HMDA data

Geographic Distribution of Loans

This performance criterion focuses on the bank's lending penetration in the AA among geographies of various income levels, with emphasis placed on the bank's performance in low- and moderate-income geographies. The geographic distribution of loans reflects reasonable dispersion within the AA.

Residential Lending

Table 6 below contains CBT's aggregated residential loan data reported by tract income in the AA for the years 2006 through 2009. As noted earlier, CBT is primarily a commercial lender, and originates an average of only nine HMDA reportable mortgage loans per year. A comparison to aggregate peer data was not provided as any single year is not statistically significant. Nevertheless, the combined 2006 - 2009 residential loan data does indicate a general willingness to lend in low- and moderate-income geographies as approximately 42 percent of the residential loans were originated in the low- and moderate-income census tracts during that period.

Table 6 - Residential Loan Distribution Table (2006 – 2009)

Income Categories	#	%	\$(000)	%
	By Tract Income			
Low	9	29.0	4,963	53.2
Moderate	4	12.9	725	7.8
Middle	11	35.5	1,809	19.4
Upper	7	22.6	1,835	19.6
Total	31	100.0	9,332	100.0

Source: 2006 – 2009 CHAT data

Small Business Lending

The geographic distribution shown below in Table 7 illustrates the bank's distribution of small business loans throughout its AA. The 27.5 percent of small business loans originated in the area's low- and moderate-income tract compares favorably to the 28.1 percent of businesses located in the same geographies.

The table also compares the bank's 2009 commercial lending to the aggregate lending within the AA. The bank's performance (31.0 percent) compares favorably to that of the aggregate (22.2 percent) in low- and moderate-income tracts.

Table 7 - Geographic Distribution of Commercial Loans by Census Tract

Census Tract Income Level	% of Total Businesses by Tract	2009 Aggregate Data	2007		2008		2009		Total	
	%	%	#	%	#	%	#	%	#	%
Low	12.5	7.8	19	12.8	11	9.4	13	11.2	43	11.3
Moderate	15.6	14.4	17	11.4	22	18.8	23	19.8	62	16.2
Middle	37.6	40.0	69	46.3	57	48.7	55	47.4	181	47.4
Upper	34.0	37.4	42	28.2	27	23.1	25	21.6	94	24.6
Unknown	0.3	0.4	2	1.3	-	-	-	-	2	0.5
Total	100.0	100.0	149	100.0	117	100.0	116	100.0	382	100.0

Source: CRA loans originated between 01/02/07 through 12/31/09; 2009 Aggregate Data - CHAT

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

This performance criterion focuses on the bank's level of lending to borrowers of different incomes and small businesses of different sizes. The CRA defines small businesses as those with gross annual revenues of \$1 million or less. The distribution of the bank's loans to individuals and small businesses represents solid performance.

Residential Lending

Similar to the analysis of the geographic distribution of residential loan data, Table 8 below contains CBT's residential loans by borrower income in the AA aggregated for the years 2006 through 2009. As stated above, CBT as a commercial bank, averages only about nine dwelling-secured loans per year. As indicated in the table, 9.7 percent of these loans were to borrowers of low- and moderate-income levels. Loans to the "unknown" category (54.8 percent) represent loans made on multi-family properties to commercial borrowers, CBT's primary customers. Aggregate comparison was not performed as the bank's loans by year were statistically insignificant. While this analysis does show some penetration of low- and moderate-income borrowers the high number of unknown borrower income makes this analysis not particularly meaningful.

Table 8 - Residential Loan Distribution Table (2006 – 2009)

Income Categories	#	%	\$(000)	%
	By Borrower Income			
Low	2	6.5	230	2.5
Moderate	1	3.2	161	1.7
Middle	4	12.9	522	5.6
Upper	7	22.6	1,741	18.7
Unknown-income	17	54.8	6,678	71.6
Total	31	100.0	9,332	100.0

Source: 2006 – 2009 CHAT data

Small Business Lending

Lending by Revenue Size

Table 9 shows that 32.7 percent of commercial loans during the review period were granted to businesses with annual revenues of \$1 million or less. The bank's lending performance falls below the percentage of businesses in the AA that are considered small businesses (87.1 percent). For 2009, however, CBT outperformed the aggregate (32.7 percent to 18.9 percent) in the AA. As stated in the Performance Context section, smaller banks such as CBT have continued to lend during the economic downturn, and CBT has the advantage of being the only Connecticut-based bank headquartered in

Hartford. According to the bank, gross annual revenues (18.3 percent) in the unknown category (N/A) represent revenues of start-up companies. Assuming these start-up companies would probably generate \$1 million or less in revenues, the total loans to small businesses would have reached 51 percent.

Table 9 - Commercial Loan Originations by Gross Revenue of Business

Gross annual revenues	% of Businesses with revenues \$1 million or less	2009 Aggregate Data	2007		2008		2009		Total	
			#	%	#	%	#	%	#	%
\$1 million or less	87.1	18.9	53	35.6	34	29.1	38	32.8	125	32.7
Over \$1 million	7.4	-	59	39.6	61	52.1	67	57.8	187	49.0
N/A	5.6	-	37	24.8	22	18.8	11	9.4	70	18.3
Total	100.0		149	100.0	117	100.0	116	100.0	382	100.0

Source: CRA loans from 01/02/07 through 12/31/09; 2009 Aggregate Data - CHAT

Lending by Loan Amount

An analysis was also conducted based on loan amount (see Table 10 below). Loans originated with smaller dollar amounts are typically considered to be made to smaller businesses indicating a willingness to engage in small business lending. The bank's total origination of loans with amounts less than or equal to \$250,000 represent 64.1 percent of total loans extended. In 2009, this amount totaled 65.5 percent of the bank's commercial portfolio. In comparison, this percentage is below that of the 2009 aggregate performance (96.5 percent). It should be noted that the aggregate data includes very large financial institutions that offer a considerable volume of business loans to small and large businesses nationwide. Considering the volume generated by these institutions, the bank's lending based on loan size is considered reasonable.

Table 10 - Commercial Loan Originations by Loan Amount

Loan Amount	2009 Aggregate Data	2007		2008		2009		Total	
		#	%	#	%	#	%	#	%
<= \$100,000	93.5	60	40.3	54	46.2	42	36.2	156	40.8
\$100,001 - \$250,000	3.0	33	22.1	22	18.8	34	29.3	89	23.3
\$250,001- \$1 million	3.5	42	28.2	36	30.8	37	31.9	115	30.1
>\$1million	0.0	14	9.4	5	4.2	3	2.6	22	5.8
Total	100.0	149	100.0	117	100.0	116	100.0	382	100.0

Source: CRA loans originated between 01/02/07 through 12/31/09; 2009 Aggregate Data - CHAT

Response to Complaints

No CRA-related complaints have been received since the bank opened for business.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No violations of the substantive provisions of the anti-discriminatory laws and regulations were identified during the examination.