

PUBLIC DISCLOSURE

August 1, 2005

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Equitable Bank
Fort Lauderdale, Florida**

RSSD ID Number: 543637

**FEDERAL RESERVE BANK OF ATLANTA
1000 Peachtree Street, N.E.
Atlanta, Georgia 30309-4470**

Note: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

	PAGE
GENERAL INFORMATION	1
INSTITUTION'S CRA RATING	1
DESCRIPTION OF INSTITUTION	2
DESCRIPTION OF ASSESSMENT AREA	4
CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA	10
Loan-to-Deposit Ratio Analysis	10
Assessment Area Concentration	10
Lending to Borrowers of Different Incomes and Businesses of Different Sizes	11
Geographic Distribution of Loans	20
Complaints	22
Compliance with Antidiscrimination Laws	22

TABLES

	PAGE
COMPOSITION OF THE LOAN PORTFOLIO	2
1990 WHOLE BANK ASSESSMENT AREA DEMOGRAPHICS	5
2000 WHOLE BANK ASSESSMENT AREA DEMOGRAPHICS	7
UNEMPLOYMENT RATES FOR YEARS 2001 - 2004	9
LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREA	11
2001-2002 HMDA LOAN DISTRIBUTION TABLE	12
2001-2002 COMMERCIAL LOAN DISTRIBUTION TABLE	13
2003 HMDA LOAN DISTRIBUTION TABLE	15
2003 COMMERCIAL LOAN DISTRIBUTION TABLE	16
2004-2005 HMDA LOAN DISTRIBUTION TABLE	17
2004-2005 COMMERCIAL LOAN DISTRIBUTION TABLE	18
APPENDIX A: AGGREGATE TABLES	23

DEFINITIONS

Income Definitions

Throughout this evaluation, the following definitions are used for the various income levels. These levels are defined in the CRA.

Low-Income - An individual income, or median family income for geographies, that is less than 50 percent of the area median income.

Moderate-Income - An individual income, or median family income for geographies, that is at least 50 percent but less than 80 percent of the area median income.

Middle-Income - An individual income, or median family income for geographies, that is at least 80 percent but less than 120 percent of the area median income.

Upper-Income - An individual income, or median family income for geographies, that is 120 percent or more of the area median income.

Other Definitions

ATM - Automated Teller Machine
FDIC - Federal Deposit Insurance Corporation
HUD - Department of Housing and Urban Development
LPO - Loan Production Office
MSA - Metropolitan Statistical Area

ROUNDING CONVENTION

Because the percentages presented in tables were rounded to the nearest whole number in most cases, some columns may not total exactly 100 percent.

GENERAL INFORMATION

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

This document is an evaluation of the CRA performance of Equitable Bank prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of August 1, 2005. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

Equitable Bank's average loan-to-deposit (LTD) ratio for the past fifteen quarters ending March 31, 2005 is **MORE THAN REASONABLE** given the institution's size, financial condition, and competition within the assessment area. A **MAJORITY** of the bank's loans were extended to individuals and businesses **IN** its assessment area. Based on samples of commercial and HMDA loans, lending reflects **POOR** penetration among borrowers of different incomes and businesses of different revenue sizes. The geographic distribution of loans reflects a **REASONABLE** dispersion throughout the bank's assessment area. The bank has received no CRA-related complaints since the previous examination. In addition, the bank is in compliance with the substantive provisions of the antidiscrimination laws and regulations.

DESCRIPTION OF INSTITUTION

Equitable Bank is a wholly owned subsidiary of Equitable Financial Group, Inc., a single bank holding company. Both companies are headquartered in Fort Lauderdale, Florida. The holding company also owns 100 percent of Equitable Equity Lending, Inc., a non-bank subsidiary. Equitable Bank operates five full-service offices, all with ATM and drive-through facilities. Four of the bank's offices are located in Broward County, Florida, and one office is located in Miami-Dade County, Florida. Since the previous examination, the bank opened the Coral Ridge office in Broward County. Additionally, the bank relocated its North Miami Beach and Plantation offices within close proximity of their former sites.

Of the bank's five branches, one is located in a low-income census tract, two are in middle-income census tracts, and two are in upper-income census tracts. According to the Consolidated Reports of Condition and Income (Call Report), between December 31, 2002 and March 31, 2005, total assets increased by nearly 14.5 percent, from \$135.6 million to \$155.2 million. During the same period, total loans increased by 1.3 percent, from \$113.8 million to \$115.3 million, while total deposits increased by 15.4 percent, from \$116.3 million to \$134.1 million.

Equitable Bank's products and services are designed to meet the needs of the local business community, as well as the personal banking needs of the residents in its assessment area. The composition of the loan portfolio, according to the March 31, 2005, December 31, 2004, and December 31, 2003 Call Reports, is displayed in the following table:

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	3/31/2005		12/31/2004		12/31/2003	
	\$ (000s)	%	\$ (000s)	%	\$ (000s)	%
Construction and Development	\$26,833	23.3%	\$26,174	22.8%	\$27,434	23.8%
Secured by One- to Four- Family Dwellings	\$7,050	6.1%	\$10,212	8.9%	\$7,485	6.5%
Other Real Estate: Farmland	\$0	0.0%	\$0	0.0%	\$0	0.0%
Multifamily	\$8,108	7.0%	\$7,179	6.3%	\$6,128	5.3%
Nonfarm Nonresidential	\$37,884	32.9%	\$37,604	32.8%	\$37,458	32.5%
Commercial and Industrial	\$33,121	28.8%	\$31,478	27.4%	\$34,487	29.9%
Loans to Individuals	\$2,093	1.8%	\$2,081	1.8%	\$2,303	2.0%
Agricultural Loans	\$0	0.0%	\$0	0.0%	\$0	0.0%
Total	\$115,089	100.0%	\$114,728	100.0%	\$115,295	100.0%

* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.

DESCRIPTION OF INSTITUTION (Continued)

The bank's loan portfolio as of March 31, 2005 consisted primarily of nonfarm nonresidential loans (32.9 percent) followed by commercial and industrial loans (28.8 percent) and construction loans (23.3 percent). The bank experienced a decline in the dollar volume of its loan portfolio between December 31, 2003 and March 31, 2005. This decrease was the result of management's efforts to eliminate some higher risk credits from the bank's portfolio. No known legal or financial impediments exist that would prevent the bank from meeting the credit needs of its assessment area. The bank received a satisfactory rating during its previous CRA evaluation, dated June 4, 2001, conducted by the Federal Reserve Bank of Atlanta.

DESCRIPTION OF ASSESSMENT AREA

Overview

Equitable Bank's assessment area has not changed since the previous examination. Based on 2000 census data, the assessment area consists of 40 census tracts in the Miami-Miami Beach-Kendall Metropolitan Division (MD) and the 279 census tracts in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD, which includes all of Broward County. These two MDs, along with the West Palm Beach-Boca Raton-Boynton Beach MD, collectively form the Miami-Fort Lauderdale-Miami Beach Metropolitan Statistical Area (MSA).

Equitable Bank's overall CRA rating was determined by evaluating the Miami-Fort Lauderdale-Miami Beach MSA assessment area using full scope examination procedures regarding geographic distribution and lending to borrowers of different income and businesses of different sizes. The HMDA and commercial loans for this analysis include loans that were originated before and after the 2000 census data became available. As a result, loans originated prior to and including 2002 were analyzed using 1990 census data, and 2003, 2004, and 2005 loans were analyzed using data from the 2000 census.

For all loans originated prior to January 1, 2003, 1990 census demographic data was used to define the bank's assessment area, which consisted of 196 census tracts. 10 (5.1 percent) of the 196 census tracts were low-income tracts, 35 (17.9 percent) were moderate-income tracts, 99 (50.5 percent) were middle-income tracts, and 48 (24.5 percent) were upper-income tracts. Four census tracts in the assessment area had no income designation.

For all loans originated after January 1, 2003, 2000 census data was used to define the bank's assessment area. Of the 319 census tracts that make up the bank's assessment area, 12 (3.8 percent) are low-income tracts, 85 (26.6 percent) are moderate-income, 137 (42.9 percent) are middle-income, and 85 (26.6 percent) are upper-income. The bank's assessment area does not arbitrarily exclude any low- or moderate-income areas and is in compliance with the CRA regulation.

DESCRIPTION OF ASSESSMENT AREA (Continued)

1990 Census Demographic Data

The following table provides key demographic information from the 1990 census that was used in analyzing the bank's CRA performance.

Assessment Area Demographics

Assessment Area : Whole Bank AA (1990 Census)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	10	5.1	9,667	2.5	3,356	34.7	77,440	19.7
Moderate-income	35	17.9	60,485	15.4	8,729	14.4	71,393	18.2
Middle-income	99	50.5	226,685	57.6	9,666	4.3	87,409	22.2
Upper-income	48	24.5	96,442	24.5	2,279	2.4	157,037	39.9
Unknown-income	4	2.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	196	100.0	393,279	100.0	24,030	6.1	393,279	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	17,133	4,187	1.0	24.4	10,844	63.3	2,102	12.3
Moderate-income	117,816	54,222	13.1	46.0	44,605	37.9	18,989	16.1
Middle-income	421,854	245,317	59.2	58.2	116,487	27.6	60,050	14.2
Upper-income	180,172	110,976	26.8	61.6	33,686	18.7	35,510	19.7
Unknown-income	17	17	0.0	100.0	0	0.0	0	0.0
Total Assessment Area	736,992	414,719	100.0	56.3	205,622	27.9	116,651	15.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	4,059	4.5	3,302	4.2	591	7.5	166	4.5
Moderate-income	13,075	14.5	11,257	14.3	1,336	17.0	482	13.2
Middle-income	46,715	51.8	40,890	52.0	3,857	49.0	1,968	53.7
Upper-income	26,270	29.1	23,147	29.4	2,080	26.4	1,043	28.5
Unknown-income	8	0.0	5	0.0	0	0.0	3	0.1
Total Assessment Area	90,127	100.0	78,601	100.0	7,864	100.0	3,662	100.0
	Percentage of Total Businesses:			87.2		8.7		4.1

DESCRIPTION OF ASSESSMENT AREA (Continued)

1990 Census Population Information

According to population data from the 1990 census, the bank's assessment area had a total population of 1,473,565 persons, which represented 11.4 percent of the state of Florida's population of 12,937,926 persons.

Income Characteristics

At the time of the 1990 census, there were 393,279 families in the assessment area. Of those families, 19.7 percent were low-income families and 18.2 percent were moderate-income families. In addition, 6.1 percent of the total families in the assessment area had income below the poverty level. The majority of these families were concentrated in the low- and moderate-income census tracts.

Housing Data

According to 1990 census data, the majority (56.3 percent) of the housing units in the bank's assessment area were owner-occupied. Housing data indicate that, of the 736,992 housing units in the bank's assessment area, one-to-four family dwellings comprised 55.6 percent of the total units. The median age of the housing stock in the assessment area was 18 years, which is higher than that of the state of Florida at 16 years. The median housing value in the assessment area was \$90,406, which is higher than that of the state of Florida at \$76,488.

Business Size Characteristics

The 1990 demographic table also provides key demographic data by revenue size and by census tract in the bank's assessment area. The table illustrates that, according to the 1990 census, 87.2 percent of the businesses in the bank's assessment area had total annual revenues of \$1 million or less and, therefore, were considered to be small businesses.

DESCRIPTION OF ASSESSMENT AREA (Continued)

2000 Census Demographic Data

The following table provides key demographic information from the 2000 census that was used in analyzing the bank's CRA performance.

Assessment Area Demographics
Assessment Area: Whole Bank AA (2000 Census)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	3.8	11,716	2.4	4,150	35.4	102,814	21.3
Moderate-income	85	26.6	127,189	26.4	21,424	16.8	87,101	18.1
Middle-income	137	42.9	211,027	43.8	16,271	7.7	97,757	20.3
Upper-income	85	26.6	132,093	27.4	4,696	3.6	194,353	40.3
Total Assessment Area	319	100.0	482,025	100.0	46,541	9.7	482,025	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	19,960	4,649	0.9	23.3	13,036	65.3	2,275	11.4
Moderate-income	239,839	124,589	23.9	51.9	86,982	36.3	28,268	11.8
Middle-income	391,957	241,902	46.3	61.7	102,528	26.2	47,527	12.1
Upper-income	217,888	151,029	28.9	69.3	37,522	17.2	29,337	13.5
Total Assessment Area	869,644	522,169	100.0	60.0	240,068	27.6	107,407	12.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3,597	4.0	3,003	3.8	438	5.5	156	4.2
Moderate-income	23,323	25.7	19,977	25.2	2,450	30.9	896	24.2
Middle-income	39,582	43.5	34,560	43.6	3,357	42.3	1,665	45.1
Upper-income	24,391	26.8	21,717	27.4	1,696	21.4	978	26.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	90,893	100.0	79,257	100.0	7,941	100.0	3,695	100.0
	Percentage of Total Businesses:			87.2		8.7		4.1

DESCRIPTION OF ASSESSMENT AREA (Continued)

2000 Census Population Information

According to population data from the 2000 census, 1,905,934 persons live within the bank's assessment area, representing approximately 11.9 percent of the state of Florida's population of 15,982,378 persons. Between the 1990 and 2000 census, the assessment area population increased by 29.3 percent or 432,369 persons, compared to a 23.5 percent increase for the state of Florida overall.

Income Characteristics

The 2000 census data indicate that there are 482,025 families in the assessment area. Of those families, 21.3 percent are low-income, 18.1 percent are moderate-income, 20.3 percent are middle-income, and 40.3 percent are upper-income. Of total families in the assessment area, 46,541 families (9.7 percent) have incomes below the poverty level. According to HUD, the estimated 2002, 2003, and 2004 median family income for the Miami Metropolitan Division was \$48,200, \$43,800, and \$45,700 respectively, and the HUD estimated 2002, 2003, and 2004 median family income for the Fort Lauderdale Metropolitan Division was \$60,200, \$56,400, and \$57,400 respectively.

Housing Data

According to 2000 census data, 60 percent of the housing units in the bank's assessment area are owner-occupied. Housing in the assessment area is primarily comprised of one-to-four family dwellings (57.1 percent) and multi-unit dwellings of five families or more (42.9 percent). Vacant units represent 12.4 percent of housing units in the assessment area. The median age of the housing stock in the assessment area has risen to 25 years. The median housing value in the assessment area increased to \$100,342 in 2000, while the median housing value in the state of Florida increased to \$93,200.

Business Size Characteristics

The demographic table on page 7 provides key demographic business data by census tract income categories within Equitable Bank's assessment area. The table illustrates that, according to the 2000 census, 87.2 percent of the businesses in the bank's assessment area have total revenues of \$1 million or less, and, therefore are considered to be small businesses.

DESCRIPTION OF ASSESSMENT AREA (Continued)

OTHER INFORMATION

Employment Characteristics

A review of 2000 data from the Bureau of Economic Analysis suggests that the service industry remains the largest employer in the Miami-Fort Lauderdale-Miami Beach MSA. The following table shows the annual unemployment rates for Miami-Dade County, Broward County, and the state of Florida from 2001 to 2004, according to the Bureau of Labor Statistics (BLS).

UNEMPLOYMENT RATES FOR YEARS 2001 – 2004				
Area	2001	2002	2003	2004
Miami-Dade County	6.0	6.6	6.0	5.6
Broward County	4.9	6.4	5.9	5.0
State of Florida	4.6%	5.7%	5.3%	4.8%

Competition

Equitable Bank operates in a highly competitive financial market due to the significant presence of banks in the assessment area. The competition comes mainly from FDIC-insured institutions with branch offices located throughout the assessment area. Many of these banks are statewide, multiregional, or national banks. According to deposit market share reports from the FDIC as of June 30, 2004, Equitable Bank ranked 55th in deposit market share in the assessment area at 0.16 percent (\$145.8 million). The top financial institution had a deposit market share of 20.1 percent. Local competition does not appear to have adversely affected the bank's ability to grow and serve the credit needs of its assessment area.

Community Contacts

As part of the CRA examination, information was obtained from two community contacts regarding local economic conditions and community credit needs. One contact stated that increased housing costs in Broward County have affected the ability of businesses to attract high quality individuals to local jobs. Recent surveys indicate that housing prices have increased approximately 37 percent over the last year and the median price of a single-family home is close to \$400,000. The contact stated that, because of rising housing costs, the local labor pool has been moving to the Stewart and Fort Pierce areas where housing is more affordable.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Scope of Examination

Both commercial loans and HMDA loans were considered in determining the bank's CRA rating. The examination review period covered commercial loans and HMDA loans originated between July 1, 2001 and June 30, 2005. Equitable Bank's dollar volume of commercial loans significantly exceeded the dollar volume of HMDA loans in the review period. Commercial loans also represented approximately 62 percent of the bank's loan portfolio as of March 31, 2005. Therefore, commercial loans were given more weight than HMDA loans in evaluating the bank's lending performance.

Because the loan samples for the CRA analysis include loans that were originated before and after 2000 census data became available, 2001 and 2002 loans were analyzed using 1990 census data, and 2003, 2004, and 2005 loans were analyzed using 2000 census data. For all loans originated prior to January 1, 2003, 1990 census demographic data were used to describe the bank's assessment area. For all loans originated in 2003, 2004 and 2005, 2000 census demographic data were used to describe the bank's assessment area.

Loan-to-Deposit Ratio

Equitable Bank's average LTD ratio is considered **MORE THAN REASONABLE** given the bank's size, financial condition, and assessment area credit needs. Based on information from the bank's Call Reports, the bank's LTD ratio as of March 31, 2005 was 84.8 percent. The bank's average LTD ratio for the fifteen-quarter period ended March 31, 2005 was 91.9 percent. This ratio compared favorably to the average LTD ratios of 25 peer banks in the assessment area, which ranged from 18.3 percent to 119.3 percent.

Assessment Area Concentration

A **MAJORITY** of the bank's lending occurred **IN** its assessment area. The following table shows the distribution of loans that were originated during the review period inside and outside the bank's assessment area, by number of loans and dollar amount, according to loan type.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Lending Inside and Outside the Assessment Area

Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	4	57.1	\$224	82.7	3	42.9	\$47	17.3
Home Purchase -	21	100.0	\$13,165	100.0	0	0.0	\$0	0.0
Multi-Family Housing	34	58.6	\$16,591	56.5	24	41.4	\$12,763	43.5
Refinancing	9	69.2	\$942	64.4	4	30.8	\$520	35.6
Total HMDA related	68	68.7	\$30,922	69.9	31	31.3	\$13,330	30.1
Commercial Loans	118	67.0	\$34,443	54.0	58	33.0	\$29,334	46.0
Total Commercial Loans	118	67.0	\$34,443	54.0	58	33.0	\$29,334	46.0
TOTAL LOANS	186	67.6	\$65,365	60.5	89	32.4	\$42,664	39.5

As indicated by the above table, 67.6 percent of the bank's HMDA and commercial loans were made inside the bank's assessment area. Also, 60.5 percent of the loan dollar volume associated with these loans was inside the bank's assessment area.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

To evaluate Equitable Bank's performance in lending to borrowers of different incomes and businesses of different sizes, commercial loans and HMDA loans within the bank's assessment area were analyzed. Borrower income classifications were assigned in accordance with the definitions presented earlier in this report. For the analysis, the distribution of commercial lending by revenue size and HMDA loans by borrower income level was compared with available demographic information.

Analysis Based on 1990 Census Data

For this analysis, 38 HMDA loans and 56 commercial loans originated in the bank's assessment area between July 1, 2001 and December 31, 2002 were compared to 1990 census demographic data. The bank's HMDA lending performance was also compared to aggregate data. Aggregate data are defined as data reported by all financial institutions in the bank's assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

HMDA Loan Distribution Table

Assessment Area: Whole Bank AA – 2001 & 2002

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	2	20.0%	388	5.6%	0	0.0%	0	0.0%
Upper	8	80.0%	6,484	94.4%	4	40.0%	1,128	16.4%
Unknown	0	0.0%	0	0.0%	6	60.0%	5,744	83.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>6,872</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>6,872</i>	<i>100.0%</i>
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	1	100.0%	101	100.0%
Upper	1	100.0%	101	100.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>101</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>101</i>	<i>100.0%</i>
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	100.0%	45	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	45	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	5	19.2%	3,392	25.4%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>5</i>	<i>19.2%</i>	<i>3,392</i>	<i>25.4%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	12	46.2%	5,010	37.5%	0	0.0%	0	0.0%
Upper	9	34.6%	4,941	37.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	26	100.0%	13,343	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>26</i>	<i>100.0%</i>	<i>13,343</i>	<i>100.0%</i>	<i>26</i>	<i>100.0%</i>	<i>13,343</i>	<i>100.0%</i>
HMDA Totals								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	5	13.2%	3,392	16.7%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>5</i>	<i>13.2%</i>	<i>3,392</i>	<i>16.7%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	15	39.5%	5,443	26.7%	1	2.6%	101	0.5%
Upper	18	47.4%	11,526	56.6%	5	13.2%	1,173	5.8%
Unknown	0	0.0%	0	0.0%	32	84.2%	19,087	93.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>38</i>	<i>100.0%</i>	<i>20,361</i>	<i>100.0%</i>	<i>38</i>	<i>100.0%</i>	<i>20,361</i>	<i>100.0%</i>

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Commercial Loan Distribution Table

Assessment Area/Group: Whole Bank AA - 2001 & 2002

Income Categories	Commercial			
	#	%	\$(000s)	%
	By Tract Income			
Low	7	12.5%	1,267	7.0%
Moderate	4	7.1%	1,338	7.4%
<i>Low/Moderate Total</i>	<i>11</i>	<i>19.6%</i>	<i>2,605</i>	<i>14.3%</i>
Middle	33	58.9%	11,889	65.5%
Upper	12	21.4%	3,664	20.2%
Unknown	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%
Total	56	100.0%	18,158	100.0%
	By Revenue			
\$1 Million or Less	26	46.4%	7,122	39.2%
Over \$1 Million	15	26.8%	7,659	42.2%
Not Known	15	26.8%	3,377	18.6%
Total	56	100.0%	18,158	100.0%
	By Loan Size			
\$100,000 or less	27	48.2%	1,649	9.1%
\$100,001 - \$250,000	13	23.2%	2,563	14.1%
\$250,001 - \$1 Million	11	19.6%	6,046	33.3%
Over \$1 Million	5	8.9%	7,900	43.5%
Total	56	100.0%	18,158	100.0%
	By Loan Size and Revenue \$1 Million or Less			
\$100,000 or less	16	61.5%	1,109	15.6%
\$100,001 - \$250,000	5	19.2%	1,040	14.6%
\$250,001 - \$1 Million	3	11.5%	1,823	25.6%
Over \$1 Million	2	7.7%	3,150	44.2%
Total	26	100.0%	7,122	100.0%

Originations and Purchases

Lending to Borrowers of Different Incomes

As illustrated in the preceding table, none of the HMDA loans in the sample were originated to low-income borrowers, while 19.7 percent of families in the assessment area were classified as low-income. None of the bank's HMDA loans originated in 2001 and 2002 were made to moderate-income borrowers, while 18.2 percent of families in the assessment area were classified as moderate-income.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Based on the information available, the bank's HMDA lending to low-income and moderate-income borrowers compares unfavorably to the aggregate's lending at 6.6 percent to low-income borrowers and 18.3 percent to moderate-income borrowers.

Lending to Businesses of Different Sizes

Of the sample of 56 commercial loans originated from July 1, 2001 through December 31, 2002 within the bank's assessment area, 46.4 percent were extended to businesses with gross annual revenues of \$1 million or less, which is below the 87.2 percent of total businesses in the assessment area that are considered to be small businesses. However, nearly one-half (48.2 percent) of the commercial loans originated were in amounts of \$100,000 or less, indicating the bank's willingness to make small loans to businesses.

Analysis Based on 2000 Census Data

To evaluate Equitable Bank's performance in lending to borrowers of different incomes and businesses of different sizes, 30 HMDA loans and 62 commercial loans originated within the bank's assessment area from January 1, 2003 through June 30, 2005 were analyzed. Loans originated in 2003 were analyzed separately from the loans originated in 2004 and 2005 because of the Office of Management and Budget's (OMB) MSA definition changes in 2004. Borrower income classifications were assigned in accordance with the definitions presented earlier in this report. For this analysis, the distribution of HMDA loans by borrower income level was compared to 2000 census demographic data and to the aggregate's lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

HMDA Loan Distribution Table

Assessment Area: Whole Bank AA - 2003

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	1	20.0%	193	5.7%	1	20.0%	193	5.7%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>1</i>	<i>20.0%</i>	<i>193</i>	<i>5.7%</i>	<i>1</i>	<i>20.0%</i>	<i>193</i>	<i>5.7%</i>
Middle	2	40.0%	603	17.9%	0	0.0%	0	0.0%
Upper	2	40.0%	2,582	76.4%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	4	80.0%	3,185	94.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>3,378</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>3,378</i>	<i>100.0%</i>
Refinance								
Low	0	0.0%	0	0.0%	1	100.0%	70	100.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>1</i>	<i>100.0%</i>	<i>70</i>	<i>100.0%</i>
Middle	1	100.0%	70	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>70</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>70</i>	<i>100.0%</i>
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	33.3%	135	75.4%	1	33.3%	15	8.4%
<i>Low/Moderate Total</i>	<i>1</i>	<i>33.3%</i>	<i>135</i>	<i>75.4%</i>	<i>1</i>	<i>33.3%</i>	<i>15</i>	<i>8.4%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	2	66.7%	44	24.6%	2	66.7%	164	91.6%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>179</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>179</i>	<i>100.0%</i>
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	5	83.3%	1,668	95.4%	0	0.0%	0	0.0%
Upper	1	16.7%	80	4.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	6	100.0%	1,748	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>1,748</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>1,748</i>	<i>100.0%</i>
HMDA Totals								
Low	1	6.7%	193	3.6%	2	13.3%	263	4.9%
Moderate	1	6.7%	135	2.5%	1	6.7%	15	0.3%
<i>Low/Moderate Total</i>	<i>2</i>	<i>13.3%</i>	<i>328</i>	<i>6.1%</i>	<i>3</i>	<i>20.0%</i>	<i>278</i>	<i>5.2%</i>
Middle	8	53.3%	2,341	43.6%	0	0.0%	0	0.0%
Upper	5	33.3%	2,706	50.3%	2	13.3%	164	3.1%
Unknown	0	0.0%	0	0.0%	10	66.7%	4,933	91.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>5,375</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>5,375</i>	<i>100.0%</i>

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Commercial Loan Distribution Table

Assessment Area/Group: Whole Bank AA - 2003

Income Categories	Commercial			
	#	%	\$(000s)	%
	By Tract Income			
Low	5	12.8%	207	2.5%
Moderate	9	23.1%	3,022	36.9%
<i>Low/Moderate Total</i>	<i>14</i>	<i>35.9%</i>	<i>3,229</i>	<i>39.4%</i>
Middle	14	35.9%	1,898	23.2%
Upper	11	28.2%	3,070	37.5%
Unknown	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%
<i>Total</i>	<i>39</i>	<i>100.0%</i>	<i>8,197</i>	<i>100.0%</i>
	By Revenue			
\$1 Million or Less	20	51.3%	3,392	41.4%
Over \$1 Million	6	15.4%	986	12.0%
Not Known	13	33.3%	3,821	46.6%
<i>Total</i>	<i>39</i>	<i>100.0%</i>	<i>8,199</i>	<i>100.0%</i>
	By Loan Size			
\$100,000 or less	19	48.7%	689	8.4%
\$100,001 - \$250,000	10	25.6%	1,762	21.5%
\$250,001 - \$1 Million	9	23.1%	4,147	50.6%
Over \$1 Million	1	2.6%	1,600	19.5%
<i>Total</i>	<i>39</i>	<i>100.0%</i>	<i>8,198</i>	<i>100.0%</i>
	By Loan Size and Revenue \$1 Million or Less			
\$100,000 or less	10	50.0%	343	10.1%
\$100,001 - \$250,000	6	30.0%	1,173	34.6%
\$250,001 - \$1 Million	4	20.0%	1,875	55.3%
Over \$1 Million	0	0.0%	0	0.0%
<i>Total</i>	<i>20</i>	<i>100.0%</i>	<i>3,391</i>	<i>100.0%</i>

Originations and Purchases

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

HMDA Loan Distribution Table

Assessment Area: Whole Bank AA -2004 & 2005

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	2	33.3%	401	13.8%	0	0.0%	0	0.0%
Moderate	1	16.7%	135	4.6%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	3	50.0%	536	18.4%	0	0.0%	0	0.0%
Middle	1	16.7%	159	5.5%	0	0.0%	0	0.0%
Upper	2	33.3%	2,220	76.2%	2	33.3%	1,647	56.5%
Unknown	0	0.0%	0	0.0%	4	66.7%	1,268	43.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	6	100.0%	2,915	100.0%	6	100.0%	2,915	100.0%
Refinance								
Low	0	0.0%	0	0.0%	1	14.3%	85	11.0%
Moderate	1	14.3%	357	46.3%	1	14.3%	20	2.6%
<i>Low/Moderate Total</i>	1	14.3%	357	46.3%	2	28.6%	105	13.6%
Middle	5	71.4%	394	51.1%	1	14.3%	127	16.5%
Upper	1	14.3%	20	2.6%	3	42.9%	182	23.6%
Unknown	0	0.0%	0	0.0%	1	14.3%	357	46.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	7	100.0%	771	100.0%	7	100.0%	771	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	50.0%	420	28.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	1	50.0%	420	28.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	1	50.0%	1,080	72.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	1,500	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	2	100.0%	1,500	100.0%	2	100.0%	1,500	100.0%
HMDA Totals								
Low	2	13.3%	401	7.7%	1	6.7%	85	1.6%
Moderate	3	20.0%	912	17.6%	1	6.7%	20	0.4%
<i>Low/Moderate Total</i>	5	33.3%	1,313	25.3%	2	13.3%	105	2.0%
Middle	6	40.0%	553	10.7%	1	6.7%	127	2.4%
Upper	4	26.7%	3,320	64.0%	5	33.3%	1,829	35.3%
Unknown	0	0.0%	0	0.0%	7	46.7%	3,125	60.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	15	100.0%	5,186	100.0%	15	100.0%	5,186	100.0%

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Commercial Loan Distribution Table

Assessment Area/Group: Whole Bank AA - 2004 & 2005

Income Categories	Commercial			
	#	%	\$(000s)	%
	By Tract Income			
Low	2	8.7%	509	6.3%
Moderate	7	30.4%	1,826	22.6%
<i>Low/Moderate Total</i>	<i>9</i>	<i>39.1%</i>	<i>2,335</i>	<i>28.9%</i>
Middle	6	26.1%	2,932	36.3%
Upper	8	34.8%	2,821	34.9%
Unknown	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%
Total	23	100.0%	8,088	100.0%
	By Revenue			
\$1 Million or Less	10	43.5%	2,632	32.5%
Over \$1 Million	5	21.7%	1,538	19.0%
Not Known	8	34.8%	3,917	48.4%
Total	23	100.0%	8,087	100.0%
	By Loan Size			
\$100,000 or less	11	47.8%	583	7.2%
\$100,001 - \$250,000	4	17.4%	853	10.5%
\$250,001 - \$1 Million	6	26.1%	3,612	44.7%
Over \$1 Million	2	8.7%	3,040	37.6%
Total	23	100.0%	8,088	100.0%
	By Loan Size and Revenue \$1 Million or Less			
\$100,000 or less	5	50.0%	320	12.2%
\$100,001 - \$250,000	2	20.0%	450	17.1%
\$250,001 - \$1 Million	3	30.0%	1,862	70.7%
Over \$1 Million	0	0.0%	0	0.0%
Total	10	100.0%	2,632	100.0%

Originations and Purchases

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Lending to Borrowers of Different Incomes

As illustrated on the table on page 15, of the 15 HMDA loans originated in 2003, 2 (13.3 percent) were originated to low-income borrowers, which is lower than the percentage of low-income families in the assessment area at 21.3 percent, but higher than the percentage of non-poverty, low-income families at 11.7 percent. Also, 6.7 percent of the HMDA loans were originated to moderate-income borrowers, which is below the percentage of moderate-income families at 18.1 percent in the assessment area.

Equitable Bank's HMDA lending to low-income borrowers at 13.3 percent exceeds the aggregate's lending to low-income borrowers at 4.3 percent. The bank's HMDA lending to moderate-income borrowers at 6.7 percent is below the aggregate at 15.3 percent.

As illustrated on the table on page 17, of the 15 HMDA loans originated in 2004 and 2005, 6.7 percent were originated to low-income borrowers, although 21.3 percent of the families in the assessment area are considered low-income. In addition, 6.7 percent of the HMDA lending was made to moderate-income borrowers, which is less than the percentage of moderate-income families in the assessment area at 18.1 percent. The aggregate's lending for 2004 and 2005 HMDA data was not available during the evaluation period.

Lending to Businesses of Different Sizes

Of the sample of 39 commercial loans originated in 2003 within the bank's assessment area 26 had revenue information, 20 of the 26 (76.9 percent) were extended to businesses with gross annual revenues of \$1 million or less, which is below the 87.2 percent of total businesses in the assessment area that are considered to be small businesses. Nearly one-half (48.7 percent) of the commercial loans originated were in amounts of \$100,000 or less, indicating the bank's willingness to make small loans to businesses.

Of the sample of 23 commercial loans originated in 2004 and 2005 within the bank's assessment area 15 had revenue information, 10 (66.6 percent) were extended to businesses with gross annual revenues of \$1 million or less, which is below the 87.2 percent of total businesses in the assessment area that are classified as small businesses. 47.8 percent of the loans were in amounts of \$100,000 or less, again indicating the bank's willingness to make small business loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Based on the analysis, Equitable Bank's lending performance reflects **POOR** penetration among individuals of different income levels and businesses of different sizes.

Geographic Distribution of Loans

To evaluate Equitable Bank's performance concerning the geographic distribution of loans, HMDA and commercial loans originated within the bank's assessment area were compared to the demographic information available and to the aggregate's lending in low- and moderate-income census tracts. For all loans originated in 2001 and 2002, 1990 census data were used for the analysis of the geographic distribution of loans. For all loans originated between 2003 and 2005, 2000 census data were used.

Analysis Based on 1990 Census Data

HMDA Lending

As shown in the table on page 12, of the 38 HMDA loans originated in the bank's assessment area in 2001 and 2002, none were originated in the low-income census tracts, and 5 (13.2 percent) were originated in moderate-income tracts, which is lower than the percentage of families in low- and moderate-income tracts which contained 2.5 percent and 15.4 percent of total families in the bank's assessment area, respectively. Also, 14 percent of the families below the poverty level were in low-income tracts, and 36.3 percent were in the moderate-income tracts. Of the owner-occupied units in the bank's assessment area, 1.0 percent and 13.1 percent were in low- and moderate-income census tracts, respectively.

The bank's lack of HMDA lending in the low-income census tracts falls below the aggregate's lending of 0.7 percent in these tracts; however, the bank's lending in moderate-income census tracts, at 13.2 percent exceeds the aggregate's lending at 8.6 percent. The bank's level of performance is reasonable considering the aggregate's lending, the number of owner-occupied units in the assessment area, and the percentage of families below the poverty level in the low- and moderate-income tracts.

Commercial Lending

Of the 56 commercial loans originated in the bank's assessment area from July 1, 2001 through December 31, 2002, seven (12.5 percent) were extended to businesses in the low-income census tracts, which is significantly higher than the level of small businesses located in low-income tracts at 4.2 percent. The bank's percentage of

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

commercial loans at 7.1 percent in moderate-income tracts is significantly less than the level of small businesses in the moderate-income tracts at 14.3 percent.

Analysis Based on 2000 Census Data

HMDA Lending

As shown in the table on page 15, of the 15 HMDA loans originated in the bank's assessment area in 2003, one (6.7 percent) was originated in the low-income census tracts and one (6.7 percent) was originated in the moderate-income tracts. The low-income tracts and the moderate-income tracts contain 2.4 percent and 26.4 percent of total families in the bank's assessment area, respectively. Also, 54.9 percent of the families below the poverty level are in low- and moderate-income tracts. Of the owner-occupied units in the bank's assessment area, 0.9 percent and 23.9 percent are in low- and moderate-income census tracts, respectively.

The bank's level of HMDA lending in low-income census tracts at 6.7 percent exceeds the aggregate's lending in low-income census tracts at 1.0 percent. The bank's HMDA lending of 6.7 percent in moderate-income census tracts is significantly below the aggregate's lending of 18.4 percent in moderate-income tracts. The bank's level of performance is excellent for the low-income census tracts, but poor for the moderate-income tracts considering the aggregate's lending, the number of owner-occupied units in the assessment area, and the percentage of families below the poverty level in the low- and moderate-income tracts.

In 2004 and 2005, of the 15 HMDA loans originated in the bank's assessment area, two (13.3 percent) were originated in low-income census tracts, and three (20 percent) were originated in moderate-income tracts. Based on 2000 census data, low-income tracts and the moderate-income tracts contained 2.4 percent and 26.4 percent of total families in the bank's assessment area, respectively. Of the owner-occupied units in the bank's assessment area, 0.9 percent and 23.9 percent are in low- and moderate-income census tracts, respectively. The aggregate's lending for 2004 and 2005 HMDA data was not available during the evaluation period. The bank's level of performance is excellent for the low-income census tracts and reasonable for the moderate-income tracts considering the number of owner-occupied units in the assessment area and the percentage of families below the poverty level in the low- and moderate-income tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)

Commercial Lending

Of the 39 commercial loans originated in 2003 within the bank's assessment area, five (12.8 percent) were extended to businesses in the low-income census tracts. Of the small businesses within the bank's assessment area, only 3.8 percent are in low-income tracts. The bank's percentage of commercial loans at 23.1 percent in moderate-income tracts is comparable to the number of small businesses in the moderate-income tracts at 25.2 percent.

In 2004 and 2005, of the 23 commercial loans originated in the bank's assessment area, two (8.7 percent) were extended to businesses in low-income census tracts, and seven (30.4 percent) were made to businesses in moderate-income census tracts. The level of lending in the low-income tracts is higher than the percentage of small businesses in the low-income tracts at 3.8 percent and higher than the percentage of small businesses in moderate-income tracts at 25.2 percent.

Based on the above analysis, the overall geographic distribution of loans reflects **REASONABLE** dispersion throughout the bank's assessment area.

Complaints

No CRA-related complaints have been received since the previous performance evaluation.

Compliance with Antidiscrimination Laws

The bank is in compliance with the substantive provisions of the antidiscrimination laws and regulations. No evidence of discrimination or the use of illegal credit practices was noted during the review of bank policies and procedures. No practices have the intent or the effect of discouraging applicants for credit.

APPENDIX A: AGGREGATE LENDING TABLES

Peer Group HMDA Loan Distribution Table

Whole Bank AA - 2002

	HMDA							
	By Tract Income					By Borrower Income		
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	698	0.9%	69,912	0.6%	5,260	6.8%	341,932	2.9%
Moderate	7,196	9.3%	656,298	5.7%	14,916	19.3%	1,401,892	12.1%
<i>Low/Moderate Total</i>	<i>7,894</i>	<i>10.2%</i>	<i>726,210</i>	<i>6.3%</i>	<i>20,176</i>	<i>26.1%</i>	<i>1,743,824</i>	<i>15.0%</i>
Middle	46,257	59.9%	6,120,604	52.8%	16,615	21.5%	2,061,777	17.8%
Upper	23,056	29.9%	4,752,576	41.0%	26,958	34.9%	5,813,026	50.1%
Unknown	25	0.0%	3,169	0.0%	13,483	17.5%	1,983,932	17.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>77,232</i>	<i>100.0%</i>	<i>11,602,559</i>	<i>100.0%</i>	<i>77,232</i>	<i>100.0%</i>	<i>11,602,559</i>	<i>100.0%</i>
	Refinance							
Low	468	0.6%	38,978	0.3%	5,140	6.3%	357,093	3.0%
Moderate	6,404	7.8%	590,321	5.0%	14,250	17.4%	1,325,324	11.3%
<i>Low/Moderate Total</i>	<i>6,872</i>	<i>8.4%</i>	<i>629,299</i>	<i>5.4%</i>	<i>19,390</i>	<i>23.6%</i>	<i>1,682,417</i>	<i>14.3%</i>
Middle	45,500	55.4%	5,573,135	47.5%	18,150	22.1%	2,123,201	18.1%
Upper	29,699	36.2%	5,535,769	47.2%	32,018	39.0%	6,180,232	52.6%
Unknown	5	0.0%	695	0.0%	12,518	15.3%	1,753,048	14.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>82,076</i>	<i>100.0%</i>	<i>11,738,898</i>	<i>100.0%</i>	<i>82,076</i>	<i>100.0%</i>	<i>11,738,898</i>	<i>100.0%</i>
	Home Improvement							
Low	21	0.6%	938	0.4%	318	8.4%	12,432	5.8%
Moderate	321	8.5%	12,779	6.0%	717	18.9%	30,454	14.3%
<i>Low/Moderate Total</i>	<i>342</i>	<i>9.0%</i>	<i>13,717</i>	<i>6.4%</i>	<i>1,035</i>	<i>27.3%</i>	<i>42,886</i>	<i>20.1%</i>
Middle	2,181	57.5%	111,665	52.4%	987	26.0%	45,938	21.5%
Upper	1,267	33.4%	87,776	41.2%	1,616	42.6%	113,317	53.2%
Unknown	4	0.1%	33	0.0%	156	4.1%	11,050	5.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>3,794</i>	<i>100.0%</i>	<i>213,191</i>	<i>100.0%</i>	<i>3,794</i>	<i>100.0%</i>	<i>213,191</i>	<i>100.0%</i>
	Multi-Family							
Low	22	5.3%	13,428	2.9%	0	0.0%	0	0.0%
Moderate	114	27.4%	84,269	18.3%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>136</i>	<i>32.7%</i>	<i>97,697</i>	<i>21.2%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	213	51.2%	262,903	57.1%	0	0.0%	0	0.0%
Upper	67	16.1%	99,618	21.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	416	100.0%	460,218	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>416</i>	<i>100.0%</i>	<i>460,218</i>	<i>100.0%</i>	<i>416</i>	<i>100.0%</i>	<i>460,218</i>	<i>100.0%</i>
	HMDA Totals							
Low	1,209	0.7%	123,256	0.5%	10,718	6.6%	711,457	3.0%
Moderate	14,035	8.6%	1,343,667	5.6%	29,883	18.3%	2,757,670	11.5%
<i>Low/Moderate Total</i>	<i>15,244</i>	<i>9.3%</i>	<i>1,466,923</i>	<i>6.1%</i>	<i>40,601</i>	<i>24.8%</i>	<i>3,469,127</i>	<i>14.4%</i>
Middle	94,151	57.6%	12,068,307	50.3%	35,752	21.9%	4,230,916	17.6%
Upper	54,089	33.1%	10,475,739	43.6%	60,592	37.1%	12,106,575	50.4%
Unknown	34	0.0%	3,897	0.0%	26,573	16.3%	4,208,248	17.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>163,518</i>	<i>100.0%</i>	<i>24,014,866</i>	<i>100.0%</i>	<i>163,518</i>	<i>100.0%</i>	<i>24,014,866</i>	<i>100.0%</i>

APPENDIX A: AGGREGATE LENDING TABLES (Continued)

Peer Group HMDA Loan Distribution Table

Whole Bank AA - 2003

	By Tract Income				HMDA				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase											
Low	1,145	1.4%	122,483	0.9%	3,344	4.0%	242,116	1.7%				
Moderate	17,377	20.6%	1,794,738	12.9%	13,128	15.6%	1,312,785	9.4%				
<i>Low/Moderate Total</i>	<i>18,522</i>	<i>22.0%</i>	<i>1,917,221</i>	<i>13.7%</i>	<i>16,472</i>	<i>19.5%</i>	<i>1,554,901</i>	<i>11.1%</i>				
Middle	38,047	45.1%	5,377,688	38.6%	17,853	21.2%	2,296,143	16.5%				
Upper	27,750	32.9%	6,654,561	47.7%	33,768	40.0%	7,482,727	53.6%				
Unknown	0	0.0%	0	0.0%	16,226	19.2%	2,615,699	18.8%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
<i>Total</i>	<i>84,319</i>	<i>100.0%</i>	<i>13,949,470</i>	<i>100.0%</i>	<i>84,319</i>	<i>100.0%</i>	<i>13,949,470</i>	<i>100.0%</i>				
Refinance												
Low	984	0.7%	92,999	0.5%	6,056	4.5%	435,996	2.2%				
Moderate	22,658	17.0%	2,168,612	11.0%	20,296	15.2%	1,950,584	9.9%				
<i>Low/Moderate Total</i>	<i>23,642</i>	<i>17.7%</i>	<i>2,261,611</i>	<i>11.4%</i>	<i>26,352</i>	<i>19.7%</i>	<i>2,386,580</i>	<i>12.1%</i>				
Middle	58,158	43.6%	7,384,014	37.3%	27,461	20.6%	3,329,243	16.8%				
Upper	51,714	38.7%	10,151,683	51.3%	55,619	41.7%	10,616,353	53.6%				
Unknown	0	0.0%	0	0.0%	24,082	18.0%	3,465,132	17.5%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
<i>Total</i>	<i>133,514</i>	<i>100.0%</i>	<i>19,797,308</i>	<i>100.0%</i>	<i>133,514</i>	<i>100.0%</i>	<i>19,797,308</i>	<i>100.0%</i>				
Home Improvement												
Low	22	0.7%	920	0.6%	177	5.9%	4,853	3.1%				
Moderate	586	19.5%	22,082	14.2%	422	14.1%	13,083	8.4%				
<i>Low/Moderate Total</i>	<i>608</i>	<i>20.3%</i>	<i>23,002</i>	<i>14.8%</i>	<i>599</i>	<i>20.0%</i>	<i>17,936</i>	<i>11.5%</i>				
Middle	1,327	44.3%	63,519	40.8%	668	22.3%	24,094	15.5%				
Upper	1,063	35.5%	69,007	44.4%	1,544	51.5%	91,518	58.8%				
Unknown	0	0.0%	0	0.0%	187	6.2%	21,980	14.1%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
<i>Total</i>	<i>2,998</i>	<i>100.0%</i>	<i>155,528</i>	<i>100.0%</i>	<i>2,998</i>	<i>100.0%</i>	<i>155,528</i>	<i>100.0%</i>				
Multi-Family												
Low	34	7.8%	18,025	2.8%	0	0.0%	0	0.0%				
Moderate	193	44.1%	225,067	34.8%	0	0.0%	0	0.0%				
<i>Low/Moderate Total</i>	<i>227</i>	<i>51.8%</i>	<i>243,092</i>	<i>37.6%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>				
Middle	169	38.6%	255,687	39.6%	0	0.0%	0	0.0%				
Upper	42	9.6%	147,126	22.8%	0	0.0%	0	0.0%				
Unknown	0	0.0%	0	0.0%	438	100.0%	645,905	100.0%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
<i>Total</i>	<i>438</i>	<i>100.0%</i>	<i>645,905</i>	<i>100.0%</i>	<i>438</i>	<i>100.0%</i>	<i>645,905</i>	<i>100.0%</i>				
HMDA Totals												
Low	2,185	1.0%	234,427	0.7%	9,577	4.3%	682,965	2.0%				
Moderate	40,814	18.4%	4,210,499	12.2%	33,846	15.3%	3,276,452	9.5%				
<i>Low/Moderate Total</i>	<i>42,999</i>	<i>19.4%</i>	<i>4,444,926</i>	<i>12.9%</i>	<i>43,423</i>	<i>19.6%</i>	<i>3,959,417</i>	<i>11.5%</i>				
Middle	97,701	44.2%	13,080,908	37.9%	45,982	20.8%	5,649,480	16.4%				
Upper	80,569	36.4%	17,022,377	49.3%	90,931	41.1%	18,190,598	52.7%				
Unknown	0	0.0%	0	0.0%	40,933	18.5%	6,748,716	19.5%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
<i>Total</i>	<i>221,269</i>	<i>100.0%</i>	<i>34,548,211</i>	<i>100.0%</i>	<i>221,269</i>	<i>100.0%</i>	<i>34,548,211</i>	<i>100.0%</i>				