



**LARGE BANK**

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

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## **Public Disclosure**

**February 27, 2004**

# **Community Reinvestment Act Performance Evaluation**

**Metropolitan National Bank  
Charter Number: 17591**

**600 South Glenstone Ave.  
Springfield, Missouri 65802**

**Office of the Comptroller of the Currency**

**Western District Office  
Kansas City South Field Office  
1710 East 32<sup>nd</sup> Street  
Joplin, Missouri 64804**

**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.

## **Description of Institution**

Metropolitan National Bank (MNB) is a \$290 million intrastate financial institution headquartered in Springfield, Missouri. MNB is a wholly owned subsidiary of Marshfield Investment Company (MIC), a \$366 million multi-bank holding company also headquartered in Springfield, Missouri. MIC owns one other national bank in Lamar, Missouri, and one state bank in Kimberling City, Missouri.

MNB is a full-service banking institution, which offers a variety of retail and commercial banking services. MNB operates five branches and four Automated Teller Machines (ATMs) in Springfield, Missouri. The bank's primary lending focus is on home mortgage and commercial lending. Tier 1 capital is \$25 million, which is 8.61 percent of total assets. For additional information on the products and services offered by MNB, please refer to the bank's CRA Public File.

MNB has designated the entire metropolitan area (MA) of Springfield, MO as its assessment area (AA). The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income (LMI) areas. For additional information on MNB's assessment area, see Market Profile – Demographic Information Tables in Appendix B.

MNB's performance was rated "Satisfactory" at the last CRA examination in April 1998. This is the bank's first evaluation under Large Bank CRA examination procedures.

## **Evaluation Period**

We evaluated MNB's mortgage, small business, and small farm lending using data for the period beginning January 1, 2002 through December 31, 2002. MNB began collecting small business and small farm loan data in 2002. To evaluate performance from prior years, we sampled 20 mortgage loans and 20 commercial loans from 1999-2001. Primary weight is placed on MNB's performance in 2002.

For community development loans, investments, and services, our evaluation period was from April 27, 1998 (the ending date of the last CRA examination), through February 27, 2004 (the starting date of this evaluation).

## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated “**Satisfactory**”.

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

Performance Levels	Metropolitan National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	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.

Home mortgage lending is the bank’s primary product followed by small business loans. Based on loan volumes for home mortgage loans, more weight is given to home refinance loans and followed by home purchase loans. MNB did not originate any home improvement loans. We did not analyze performance for multifamily loans since MNB only originated four of such loans in 2002.

The AA consists of two low-income census tracts. One of the tracts is comprised of a prison facility and has minimal lending opportunities. Identified credit needs in the AA include activities targeted to the revitalization of the downtown area in Springfield, Missouri, and affordable housing.

The major factors that support this overall rating and conclusions with respect to performance tests include:

### **Lending**

Refer to Table 1 through 12 in Appendix C for facts and data used to evaluate the bank’s lending.

Performance under the lending test is rated high satisfactory. The overall distribution of home mortgage loans by income level of the borrower is good. MNB’s distribution of small business loans in LMI areas and to businesses of different sizes is also good. Community development lending is significant, which has a positive impact on the Lending Test. Performance in 1999-2001 does not negatively impact the bank’s rating.

- MNB's lending activity is adequate in the Springfield MA. The bank's deposit market share is 3.26 percent (9<sup>th</sup> in the market). The overall market share for small business loans is 2.59 percent, which is somewhat lower than MNB's deposit market share. The overall market share for small farm loans is 5.23 percent (4<sup>th</sup> in the market), which exceeds the deposit market share. Market share for home refinance and home purchase loans is not significant at less than 2 percent.
- MNB's distribution of home purchase and refinance loans in moderate-income areas needs improvement. The percentage of bank loans in moderate-income census tracts is significantly below demographics, which is attributed to the lack of bank offices in these areas, and strong competition from other financial institutions. Home mortgage loan performance in low-income areas is not meaningful since the percentage of owner-occupied units in these geographies is 0.05 percent.
- MNB's distribution of small business loans in LMI areas is good. The percentage of these loans in LMI geographies is somewhat lower than demographics. However, the bank's market share in low-income census tracts exceeds its overall market share for small business loans. The market share of small business loans in moderate-income census-tracts is near to its overall market share. MNB did not originate any small farm loans in LMI areas in 2002. The percentage of farms in low-income geographies is not significant at 0.39 percent. Only one moderate-income census tract in the AA has farm loan demand. This census tract is approximately 20 miles from the nearest bank location and has two other financial institutions. MNB does not have any deposit market share within this moderate-income geography.
- Approximately 82 percent of MNB's reportable loans (by number) were made inside its AA, which represents an adequate percentage.
- MNB's distribution of home purchase and refinanced loans to low-income individuals is good considering 10 percent of families in the AA are below poverty levels. The distribution of home purchase loans to moderate-income individuals is good as the percentage of loans is near to demographics. The distribution of home refinance loans to moderate-income individuals is excellent as the percentage of loans exceeds demographics. MNB's distribution of small loans to businesses and farms is good. Loans to businesses and farms with revenues of \$1 million or less are somewhat below and near to demographics, respectively. However, the market share of these loans exceeds their overall market share.
- MNB's community development lending positively affected its rating. MNB originated one qualified loan for \$1.4 million. This activity is favorable because it helped provide low-income housing and integration into a middle-income census tract. Affordable housing is an identified credit need in the AA. Competition for community development loans in the AA is strong.
- MNB uses flexible underwriting practices to make home loans to LMI individuals and loans to help stabilize LMI geographies.

## **Investments**

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

Performance under the investment test is rated outstanding.

- MNB's investment activity in the Springfield MA is excellent. Current period investments total \$1.1 million. A majority of these investments are attributed to the bank's holding company, Marshfield Investment Company (MIC). MIC purchased \$731,000 in low-income housing tax credits to fund a residential development project in the AA. MNB purchased a \$380,000 tax revenue bond to help remove blight and create jobs for LMI individuals. In addition, MNB donated \$12,000 to organizations to help revitalize/stabilize LMI geographies and provide services targeted to LMI individuals.

## **Services**

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

Performance under the service test is rated low satisfactory.

- MNB's offices and retail services are reasonably accessible to geographies and individuals of all income levels. All branches are located in middle-income geographies. One branch is adjacent to a moderate-income census tract. Only 1 percent of the population in the AA is located in low-income geographies. Approximately 23 percent of the population resides in moderate-income geographies. During the evaluation period, MNB opened one branch and closed one branch. However, there was no impact to LMI census tracts.
- MNB's community development services are considered adequate. Bank personnel provided their financial expertise to four organizations that promote community development initiatives in the Springfield MA. These organizations provide services targeted to LMI individuals and help promote economic development by financing small businesses. In addition, MNB sponsored a grant application, funded by the Federal Home Loan Board, to construct affordable housing.

## **Fair Lending or Other Illegal Credit Practices Review**

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

## Appendix B: Market Profile for Metropolitan National Bank

Demographic Information for Springfield MO MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	66	3.03	30.30	51.52	15.15	0.00
Population by Geography	264,346	1.10	22.68	59.33	16.89	0.00
Owner-Occupied Housing by Geography	67,634	0.05	17.00	62.77	20.18	0.00
Business by Geography	12,929	4.94	16.60	62.06	16.40	0.00
Farms by Geography	513	0.39	12.09	72.32	15.20	0.00
Family Distribution by Income Level	71,154	18.46	18.66	24.41	38.47	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	26,416	0.45	31.90	59.06	8.58	0.00
Median Family Income		29,389	Median Housing Value	55,936		
HUD Adjusted Median Family Income for 2002		49,200	Unemployment Rate	3.4%		
Households Below Poverty Level		14.89%	(as of December 2003)			

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

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As - 12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/AA column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- 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/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

**Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

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

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

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches 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 3 and 9 ARE NOT APPLICABLE. THEREFORE, THEY ARE NOT INCLUDED IN THIS SECTION.

## Table 1. Lending Volume

LENDING VOLUME												
Geography: SPRINGFIELD MA												
Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA <sup>*</sup>	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans <sup>**</sup>		Total Reported Loans		% of Rated Area Deposits in MA/AA <sup>***</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Springfield MA	100.00	349	33,273	184	22,210	38	1,458	1	1,419	572	58,360	100.00

<sup>\*</sup> Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

<sup>\*\*</sup> The evaluation period for Community Development Loans is From April 27, 1998 to February 27, 2004.

<sup>\*\*\*</sup> Deposit Data as of December 31, 2003. 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: SPRINGFIELD MA				Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MA	147	100.00	0.05	0.00	17.00	4.08	62.77	76.87	20.18	19.05	1.87	0.00	0.58	2.25	1.56

<sup>\*</sup> Based on 2002 Peer Mortgage Data: Midwest Region.

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

<sup>\*\*\*</sup> 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 1990 Census information.

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: SPRINGFIELD MA				Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MA	198	100.00	0.05	0.00	17.00	5.05	62.77	78.28	20.18	16.67	1.44	0.00	1.10	1.69	0.98

<sup>\*</sup> Based on 2002 Peer Mortgage Data: Midwest Region.

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

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

## Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: SPRINGFIELD MA					Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% of MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MA	4	100.00	5.66	0.00	27.87	25.00	56.79	75.00	9.68	0.00	17.02	0.00	14.29	22.22	0.00

<sup>\*</sup> Based on 2002 Peer Mortgage Data: Midwest Region.

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

<sup>\*\*\*</sup> Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

## Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: SPRINGFIELD MA				Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MA	184	100.00	4.94	3.26	16.60	13.04	62.06	66.85	16.40	16.85	2.59	4.27	2.53	2.80	2.52

<sup>\*</sup> Based on 2002 Peer Small Business Data: US and PR.

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

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2003).

## Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: SPRINGFIELD MA					Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002								
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MA	38	100.00	0.39	0.00	12.09	0.00	72.32	100.00	15.20	0.00	5.23	0.00	3.23	5.71	0.00

<sup>\*</sup> Based on 2002 Peer Small Business Data: US and PR.

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

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2003).

## Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: SPRINGFIELD MA						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MA	147	100.00	18.46	8.84	18.66	17.69	24.41	34.01	38.47	39.46	2.20	1.61	1.41	2.49	2.92

<sup>\*</sup> Based on 2002 Peer Mortgage Data: Midwest Region.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by BANK.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information.

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

## Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: SPRINGFIELD MA						Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MA	198	100.00	18.46	7.29	18.66	19.79	24.41	32.81	38.47	40.10	1.92	1.62	1.94	2.29	1.73

<sup>\*</sup> Based on 2002 Peer Mortgage Data: Midwest Region.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 3.03% of loans originated and purchased by BANK.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information.

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

## Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: SPRINGFIELD MA			Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Springfield MA	184	100.00	64.00	56.52	70.65	14.13	15.22	2.59	5.72

<sup>\*</sup> Based on 2002 Peer Small Business Data: US and PR.

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

<sup>\*\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

<sup>\*\*\*\*</sup> Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 15.22% of small loans to businesses originated and purchased by the bank.

## Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: SPRINGFIELD MA			Evaluation Period: JANUARY 1, 2002 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Springfield MA	38	100.00	94.15	86.84	92.11	2.63	5.26	5.23	5.49

<sup>\*</sup> Based on 2002 Peer Small Business Data: US and PR.

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

<sup>\*\*\*</sup> Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2003).

<sup>\*\*\*\*</sup> Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 10.53% of small loans to farms originated and purchased by the bank.

## Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: SPRINGFIELD MA				Evaluation Period: APRIL 27, 1998 TO FEBRUARY 27, 2004			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Springfield MA	0	0	6	1,123	6	1,123	100.00	0	0

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\* '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: SPRINGFIELD MA				Evaluation Period: APRIL 27, 1998 TO FEBRUARY 27, 2004									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Springfield MA	100.00	5	100.00	0.00	0.00	100.00	0.00	1	1	0	0	0	0	1.10	22.68	59.33	16.89

