



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

**September 24, 2001**

# **Community Reinvestment Act Performance Evaluation**

**The Citizens National Bank  
Charter Number: 4364**

**517 Main St  
Laurel, MD 20707**

**Office of the Comptroller of the Currency**

**Maryland National Capital Area Field Office  
1025 Connecticut Avenue NW  
Suite 708  
Washington, DC 20036**

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

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## Overall CRA Rating

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

The following table indicates the performance level of **The Citizens National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Citizens National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- A majority of home mortgage loans, small loans to businesses and consumer loans originated/purchased by The Citizens National Bank (CNB) over the evaluation period were within its assessment area. Overall, 80% of the number and 79% of the dollar volume of loans were within the assessment area;
- A good geographic distribution of small loans to businesses;
- A good distribution of home mortgage loans and an excellent distribution of consumer loans to low- and moderate-income borrowers;
- Community development loans and innovative/flexible lending had a positive impact on the bank's Lending Test rating;
- An adequate level of qualified community development investments;
- CNB's service delivery systems are accessible to geographies and individuals of different income levels in the assessment area; and
- A good record of providing community development services.

## Definitions and Common Abbreviations

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

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

**Block Numbering Area (BNA)** - Statistical subdivisions of counties in which census tracts have not been established. The U.S. Census Bureau has established BNAs in conjunction with state agencies.

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

**Community Development (CD)** - Affordable housing for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

**Community Reinvestment Act (CRA)** - The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

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

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

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

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

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

**Median Family Income (MFI)** - The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Statistical Area (MSA)** - Area defined by the director of the U.S. Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

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

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

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

**Small Loans to Farms** - Loans with original amounts of \$500,000 or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

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

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

## Description of Institution

The Citizens National Bank (CNB) is a subsidiary of Mercantile Bankshares Corporation (Mercantile), a 21-bank holding company headquartered in Baltimore, Maryland. In addition to the banks, Mercantile provides mortgage banking services primarily through its affiliate Mercantile Mortgage Corporation, a subsidiary of Mercantile-Safe Deposit and Trust Company. Mercantile had total assets of \$9.3 billion as of June 30, 2001. The Mercantile banks are all locally managed and are headquartered in Maryland, Delaware and Virginia.

CNB, headquartered in Laurel, Maryland, is a mid-sized intrastate bank with 18 full service branches located in Maryland along the Baltimore-Washington corridor. In addition to providing a complete range of commercial and personal banking products in Anne Arundel, Howard, Montgomery, and Prince George's counties, CNB offers investment, trust, and cash management services to its customers.

CNB has two subsidiaries: CNB Holdings & Investments, Inc., a Delaware corporation that holds U.S. Treasury obligations, and CNB Realty Holdings, Inc. which holds other real estate owned properties. As of June 30, 2001 CNB Holdings & Investments, Inc. had total assets of \$19.6 million and CNB Realty Holdings, Inc. had total assets of \$49 thousand. These subsidiaries had no impact on the bank's capacity for community reinvestment.

As of June 30, 2001 bank assets totaled \$712 million, \$531 million, or 75% of which were net loans and \$129 million, or 18% were investments. Total deposits were \$572 million. Tier 1 Capital was \$79 million. The loan portfolio consists primarily of consumer loans, at 45% and commercial and commercial real estate loans, at 42%. Residential real estate loans represent 9% of the loan portfolio. The remaining portfolio consists of construction and development loans, at 2%, and loans to municipalities and loans for multifamily dwellings at 1% each.

CNB's primary business focus is providing business loans and consumer loans within their assessment area. For residential real estate home mortgage-related lending, the bank offers an adjustable rate mortgage product with rate adjustments every three years or every five years and maturities of 15 or 30 years. These mortgages are retained in CNB's loan portfolio and are therefore able to be underwritten with more flexibility than mortgages that are sold into the secondary market. For borrowers that want other types of home mortgage products, CNB refers them to Mercantile Mortgage Corporation, which offers a complete array of home mortgage loan products. During the evaluation period, CNB referred 51 borrowers to Mercantile Mortgage for a total of \$6.2 million in home mortgage loan originations.

CRA was most recently evaluated as of April 13, 1998. The bank received a "satisfactory" rating as a result of that review.

CNB operates in an extremely competitive financial services market with competition from community banks and large commercial banks, as well as from mutual fund companies and non-bank financial institutions. CNB is not subject to any known financial, legal or regulatory restrictions that would impede its ability to help meet the credit needs of its assessment area. Please refer to Appendix B for information regarding the bank's assessment area.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for home mortgage, small business, and consumer loans is from January 1, 1998 to June 30, 2001. The evaluation period for community development (CD) loans, investments, and services covers activity from April 13, 1998, which is the date of the last CRA examination, to September 21, 2001.

For the lending test, CNB's origination/purchase of home mortgage loans (home purchase, home improvement, and refinance loans), small loans to businesses, consumer loans (motor vehicle, home equity, other secured and other unsecured loans) and CD loans were evaluated. Management opted to provide information regarding consumer loans, although not required to do so under the CRA Regulation, as consumer loans constitute a large portion of the bank's lending activity. CNB's origination/purchase of small loans to farms was not evaluated, as the volume was not significant enough to perform a meaningful analysis (less than 1% of the number of loan originations over the lending test evaluation period).

The peer comparisons in this Evaluation include only lenders who were required to file HMDA and Small Business Reports for 1999, the most recent year for which aggregate data is available. Small business reporting is required of bank and thrift institutions with assets of \$250 million or more as of December 31 of the prior two calendar years preceding the reporting year, or an affiliate of a holding company with \$1 billion or more in assets during the same time periods.

### Data Integrity

As part of this CRA evaluation, CNB's publicly filed information on home mortgage loans and small loans to businesses was tested for accuracy. Consumer loan information is not required to be filed, nor is it required to be evaluated for CRA purposes. However, as the bank chose to have it included in our evaluation, we also tested the consumer loans for accuracy. The test included an evaluation of CNB's processes to ensure that data are reliable.

No errors were noted in home mortgage or consumer loan data. However, errors were noted in key fields of the 1998, 1999 and 2000 small loans to business data. CNB was able to isolate the sources of these errors and expeditiously correct the errors. New processes have been put into practice that should alleviate similar errors going forward. As a result, this evaluation is based on accurate data.

CD loans, investments, and services submitted by CNB management were verified to ensure that they met the regulatory definition for CD. All items submitted by CNB for consideration were included in the evaluation as they met the definition and purpose of CD.

### Selection of Areas for Full-Scope Review

The bank's assessment area consists of portions of two metropolitan statistical areas, both in the state of Maryland. The areas are Baltimore, Maryland #0720, and Washington, DC-MD-VA-WV #8840. Both of the metropolitan statistical areas are part of the Washington-Baltimore DC-MD-VA-WV consolidated metropolitan statistical area, therefore we have analyzed and concluded on the data on a full scope, combined basis.

## **Ratings**

The bank's overall rating is based on the full scope review of the entire Baltimore-Washington assessment area. Small business and consumer lending received more weight in the rating process based on the volume of originations during the evaluation period.

## **Other**

We conducted one community contact for this examination with a local economic development corporation. The contact identified the need for traditional bank financing for very small businesses, which comprise a large portion of the assessment area's businesses, and for equity/venture capital financing for small technology companies.



## Fair Lending Review

An analysis of two years of HMDA and Small Business lending data, public comments and consumer complaint information was performed according to the OCC's risk-based fair lending approach. Analysis of this data reveals no basis for the OCC to conduct a comprehensive fair lending examination in connection with the CRA evaluation this year. The latest comprehensive fair lending examination was performed as of December 31, 1997.

### Conclusions with Respect to Performance Tests

#### LENDING TEST

##### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the Washington-Baltimore DC-MD-VA-WV assessment area is rated "High Satisfactory". Based on a full-scope reviews, the bank's performance is good.

##### Lending Activity

Refer to Table 1 in appendix C for the facts and data used to evaluate the bank's lending activity.

During the evaluation period, 75% of all loans originated/purchased were consumer loans. Home mortgage-related loans were 5% and small loans to businesses were 20%. Less than 1% of the loans were small farm loan originations/purchases. Agricultural lending is not a primary business line of CNB. If the consumer loans were not included, home mortgage-related loans would represent 17% of loans originated/purchased, small loans to businesses would be 83%, and small loans to farms would be less than 1%.

Within home mortgage-related loan originations/purchases, 54% were for home improvement, 26% were for home purchase, and 20% were for refinance.

The bank's lending activity is adequate throughout their assessment area.

As of June 30, 2000, in Prince George's county, where the bank is headquartered, the bank ranked sixth for their level of deposits with 5% market share. In Howard county, the bank ranked eighth in deposits with 5% market share. In Anne Arundel county, the bank ranked 13<sup>th</sup> with 2% market share, and in Montgomery county the bank ranked 28<sup>th</sup> with less than 1% market share. The bank's market share on a combined basis for the four counties is 2% and the bank is ranked 12<sup>th</sup>. Throughout the state of Maryland the bank ranked 17<sup>th</sup> with 1% market share.

Based on 1999 peer data, CNB was ranked 15<sup>th</sup> with 2% of the market share for home improvement loans originated/purchased within their assessment area. Financial services institutions with greater market share include two nationwide mortgage companies, large regional commercial banks, credit unions, and other commercial banks. CNB had a negligible market share of less than 1% for home purchase and refinance loans within the assessment area.

Based on 1999 peer data, CNB was ranked 15<sup>th</sup> with 1% of the market share for small business loans originated/purchased within their assessment area. Financial services institutions with greater market share include nationwide credit card banks, large regional commercial banks, and other commercial banks.

Consumer loans consist of home equity lines, motor vehicle, other secured and other unsecured loans. The dollar volume of all consumer loans originated comprises a substantial 78% of CNB's Tier 1 Capital, which provides perspective on the high level of consumer lending. There is no market share data available for consumer lending.

Competition for all loan products is extremely strong within the bank's assessment area, and includes large and small community banks headquartered in Maryland, large regional banks, and nationwide financial institutions.

### **Distribution of Loans by Income Level of the Geography**

CNB's overall distribution of lending reflects an adequate penetration among geographies throughout the assessment area. The distribution of each product is described below.

#### ***Home Mortgage Loans***

Refer to Tables 2, 3 and 4 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home purchase loans is adequate. The bank made no home purchase loans in the low-income geography, which had less than one percent owner-occupied units and only 20 owner-occupied units, which resulted in limited lending opportunities. The proportion of loans in moderate-income geographies was near the percentage of owner-occupied housing units in those geographies. 1999 market share data indicates that there were no loans made by the bank in low-or moderate-income geographies.

The geographic distribution of home improvement loans is adequate. The bank made no home improvement loans in the low-income geography, which had less than one percent owner-occupied units and only 20 owner-occupied units, which resulted in limited lending opportunities. The proportion of loans in moderate-income geographies was near the percentage of owner-occupied housing units in those geographies. 1999 market share data indicates that there were no loans made by the bank in low-or moderate-income geographies.

The geographic distribution of home mortgage refinance loans is poor. The bank made no home mortgage refinance loans in either the low-or moderate-income geographies. As noted previously, opportunities to lend in the low-income geography were limited based on the minimal percentage and number of owner-occupied units.

#### ***Small Loans to Businesses***

Refer to Table 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

CNB's geographic distribution of small loans to businesses is good. Demographic data indicates that there are no businesses located in the assessment area's one low-income geography. The proportion of loans in the moderate-income geographies exceeded the percentage of businesses in the geographies. The market share in moderate-income geographies equaled the overall market share.

### ***Small Loans to Farms***

Table 6 in appendix C has been deleted as an analysis of small loans to farms is not considered meaningful.

### ***Consumer Loans***

Refer to Table 14 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans is poor. The bank made no loans in the low-income geography, and the proportion of loans in the moderate-income geographies was well below the percentage of households in those geographies. This is mitigated by the fact that the majority of consumer loans are indirect loans, and the bank can only make loans in areas where their dealers generate applications.

### ***Lending Gap Analysis***

We reviewed the geographic distribution of loans and did not detect any unexplained conspicuous gaps in lending.

### ***Inside/Outside Ratio***

A majority of the number of home mortgage loans, small loans to businesses, and consumer loans originated/purchased by CNB over the evaluation period were within its assessment area. Overall, 80% of the number and 79% of the dollar volume of all loans originated/purchased during the evaluation period were within the bank's assessment area. Eighty-two percent of the bank's small loans to businesses, 80% of consumer loans, and 77% of the home mortgage loans were within the bank's assessment area. Within home mortgage loans, 65% of home purchase loans, 83% of home improvement loans, and 82% of refinance loans were in the bank's assessment area. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of the geography.

## **Distribution of Loans by Income Level of the Borrower**

CNB's distribution of loans by borrower income level reflects a good penetration among customers of different income levels, and to business customers of different sizes, in the assessment area.

### ***Home Mortgage Loans***

Refer to Tables 7, 8, and 9 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home purchase lending is adequate. The proportion of loans to low-income borrowers equaled the percentage of low-income families, but the proportion of loans to moderate-income borrowers was below the percentage of moderate-income families. The bank's market share for low-income borrowers equaled the overall market share. In 1999, no home purchase loans were made to moderate-income borrowers.

The borrower distribution of home improvement lending is excellent. The proportion of loans to both low- and moderate-income borrowers significantly exceeded the percentage of low- and moderate-income families. The bank's market share for low-income borrowers exceeded its overall market share, while the market share for moderate-income borrowers equaled its overall market share.

The borrower distribution of home mortgage refinance lending is excellent. The proportion of loans to low-income borrowers exceeded the percentage of low-income families. The proportion of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families. The bank's market share for low-income borrowers equaled the overall market share. In 1999, no home mortgage refinance loans were made to moderate-income borrowers.

### ***Small Loans to Businesses***

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

We analyzed the distribution of small business loan originations by calculating the percentage of loans made to small businesses. A small business is defined as a business with gross annual revenues of \$1 million or less. We also evaluated the distribution of loans by original amount regardless of business size.

The distribution of small business loans is adequate when considering the strong competition within the assessment area for small business loans. The bank's percentage of lending is less than the percentage of all businesses that are small-sized in the assessment area. The market share for loans to businesses with gross annual revenues of \$1 million or less equaled their overall market share for all small business loans. A majority of small loans to businesses were for amounts less than \$100 thousand.

### ***Small Loans to Farms***

Table 11 in appendix C has been deleted as an analysis of small loans to farms is not considered meaningful.

### ***Consumer Loans***

Refer to Table 14 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of the bank's consumer loans is excellent. The percentage of loans made to low- and moderate-income borrowers significantly exceeded the percentage of low- and moderate-income households.

## **Community Development Lending**

Refer to Table 1 in appendix C for the facts and data used to evaluate the bank's level of community development lending.

Community development lending had a positive impact on the bank's Lending Test rating. CNB originated one loan, for \$203 thousand, for a commercial mortgage to purchase an adult group home for low- and moderate-income persons with disabilities. CNB also refinanced, at below market rates, two commercial mortgages totaling \$294 thousand, originated by other banks to the same organization, for group homes for low- and moderate-income persons with disabilities.

In addition, CNB originated a number of loans with community development characteristics throughout the assessment area that were included in the home mortgage and small loans to business totals. These loans had a positive impact on the assessment area.

## **Product Innovation and Flexibility**

Product innovation and flexibility had a positive impact on Lending Test conclusions.

CNB offers a full array of standard loan programs and products. In addition, CNB developed two innovative programs that offer flexible terms to customers. The two programs initiated are "Cars for Careers" and the Laurel Main Street Revitalization Program.

CNB participates in "Cars for Careers", an innovative and flexible loan program developed and implemented by CNB and a local non-profit group prior to the evaluation period. The program addresses the transportation needs of low- and moderate-income individuals located in Howard County. CNB provides affordable loans to program participants to purchase used cars that have been donated. The program is targeted to low- and moderate-income individuals who need a dependable car to get and keep a job. The loans are designed to provide participants with a sense of true ownership and help them establish a credit history. Rates are well below conventional used-car rates and underwriting is extremely flexible. There have been no applicants turned down for loans as long as the applicant was employed. CNB is the only bank currently providing loans to applicants under this program. During the evaluation period, CNB provided loans totaling \$30 thousand to 38 individuals to purchase cars in this program.

CNB offers the Laurel Main Street Revitalization Program to stimulate the development/improvement of downtown Laurel, which is economically distressed. Since the program originated, the bank has made 10 loans. Of the 10 loans, 7 (70%) were to businesses located in moderate-income geographies. The dollar volume was \$1.6 million (80%) within moderate-income geographies, of a total of \$2 million disbursed.

The program commenced in 1998, with a total commitment of \$3 million. Loans from \$25 thousand to \$300 thousand for the specific purpose of renovating commercial properties within the city of Laurel designated area. Flexible terms include below market rate financing and 25 year amortization terms.

CNB also participates in small business economic development company loan funds in each of the four assessment area counties. The participating banks provide the funds to the development companies at below-market rates. Funds are loaned by the development company to businesses to remain, expand, or move into areas that have been identified as distressed and in need of economic stabilization.

## **INVESTMENT TEST**

The bank's performance under the Investment Test is rated "Low Satisfactory". Based on a full-scope review, the bank's performance is adequate.

Refer to Table 12 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

The level of qualified investments is adequate. There are a variety of affordable housing and small business-related investment opportunities on a statewide basis. The bank has made a multi-year investment consisting of the purchase of a total of \$1.9 million in bonds from the statewide housing fund. The fund assists Maryland's low- and moderate-income residents to finance the purchase of affordable housing. This investment was neither innovative nor complex, but was responsive to the overall need within the state for affordable housing.

In addition, CNB provided a large number of grants to a wide variety of community development related organizations totaling \$210 thousand. Of note is a \$21 thousand grant to a local university that has established a program for disadvantaged children to provide remedial educational services, and a \$6 thousand grant to an organization that provides health, educational, and much-needed social services to low- and moderate-income children and their families

## **SERVICE TEST**

The bank's performance under the Service Test is rated "High Satisfactory". Based on full-scope review, the bank's performance is good.

### **Retail Banking Services**

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

CNB's service delivery systems are accessible to geographies and individuals of different income levels in its assessment area. While the bank has no branches located in their one low-income geography, less than one percent of the assessment area's population resides in the geography. CNB has 17% of its branches in moderate-income geographies, which exceeds the 9% of the assessment area's population residing in those geographies.

Branch offices are located in the state of Maryland in Laurel (head office and two branches), Beltsville, and Bowie in Prince George's county; Crofton, Hanover, Odenton, and Fort Meade in Anne Arundel county; Burtonsville and Silver Spring in Montgomery county, and Columbia, Clarksville, Ellicott City, Glenelg, and Baltimore (Waterloo-Jessup) in Howard county. During the evaluation period, CNB opened the branch in Silver Spring, which is located in a retirement community with gated access. No branches were closed during the evaluation period.

Branch hours throughout the assessment area, including the three branches located in moderate-income census tracts, are comparable. All branches have 24-hour ATMs, drive up tellers, and similar Saturday hours. CNB also has two cash dispensing ATMs located at Fort Meade. Access is restricted on post.

Customers can access their accounts at no charge at any of the over 150ATMs that are part of the Mercantile network of banks throughout Maryland, Virginia and southern Delaware.

CNB offers *Special Checking*, which is a basic checking account with a low (\$5.00) monthly fee. There is no fee per check written for the first eight checks per month. CNB also offers a *Community Organization Account*, which is available to all religious, philanthropic and civic organizations. The organizations receive a regular checking account with no minimum balance requirement and no monthly service charge.

Alternative delivery systems also include 24-hour automated telephone banking service available to all customers. This service allows customers to check account balances, transfer funds between checking, savings, and lines of credit, verify recent deposits and withdrawals, and place stop payments. Telephone access to customer service representatives are available for extended hours. Customers can put stop payments on checks, obtain product and service information, transfer funds, obtain current interest rates and annual percentage rates and yields, and confirm balances for existing loans and lines of credit.

CNB customers can also cash checks, make checking account deposits, cash payroll checks, make savings deposits and withdrawals, and make mortgage, installment loan and line of credit payments during business hours at any Mercantile Bankshares bank branch located throughout Maryland, Delaware, Virginia and York, Pennsylvania. We did not place significant weight on alternative delivery systems when arriving at a conclusion for the Service Test since the bank does not monitor how these products impact low- and moderate-income individuals.

Because there is a large and varied immigrant population in the bank's assessment area, CNB has formalized a list of employees who have the ability to provide interpreter services to non English speaking customers who want to conduct business with the bank. The "CNB Language Bank" includes those able to interpret in Chinese (Cantonese), Filipino, French, German, Hindi, Italian, Patois, Punjabi, Spanish, Tagalog, and Thai.

## **Community Development Services**

CNB provides a good level of community development services to a wide variety of organizations in its assessment area. A number of bank employees actively provide their financial and technical expertise to a number of community organizations. The community development services provided are very responsive to community development needs, including the need for small business loans. Example of community development services include:

- A bank officer provides his financial expertise as a member of the Board and the Budget Committee of a local small business financial services community development corporation.
- A bank officer provides his financial expertise as a Board member of a local community loan fund, which provides startup and financing to small business ventures.
- A bank officer provides his financial expertise by serving on the bank advisory audit committee of a local small business economic development committee.
- A bank officer provides her technical assistance as the bank's representative to a local entrepreneurial fund, which serves the housing needs of low- and moderate-income families.
- A bank officer is the President and Treasurer of a nonprofit organization that makes reliable cars available for needed transportation to jobs, at low prices and below market rate financing to local low-income individuals who might not qualify for conventional financing. CNB is a co-founder of the program, and continues to take a leadership role with this organization.

- A bank officer provides his technical assistance as grantsman to an organization that provides educational services to economically disadvantaged low-income children. The organization provides coaching, counseling, tutoring and college preparation services, and takes low-income students who would be unable to pay for college and educates them on various sources of scholarships, grants, and tuition aids, and assists in the college interview and application process.
- A bank officer provides his technical assistance as a member of the Board of a local organization that provides educational and job training services, as well as residence in group homes, to low- and moderate-income individuals with disabilities.
- A bank officer provides his technical assistance as a Board member of a local organization that provides transportation to jobs for low-income individuals.
- A bank officer provides his financial expertise as a member of a local affordable housing alliance that provides credit counseling to first time low- and moderate-income homebuyers.
- Two bank officers provide technical and financial expertise as Board members of an organization that provides a group home and educational services to disadvantaged and homeless children.

In addition, during the evaluation period, bank personnel conducted a financial services education seminar to clients of a local organization that provides vitally needed social, educational, and housing services to low- and moderate-income families.



## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation and loan products considered.

<b>Time Period Reviewed</b>	Lending Test (excluding CD Loans): 01/01/98 to 06/30/01 Investment and Service Tests and CD Loans: 05/01/98 to 09/24/01	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Citizens National Bank (CNB) Laurel, Maryland	Home purchase, home improvement and refinance loans, small business loans, motor vehicle loans, secured and unsecured consumer loans, home equity lines, and community development loans.	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Baltimore, Maryland MSA #0720 Washington, DC-MD-VA-WV MSA #8840	Full Scope Exam of combined MSAs as both MSAs are part of the Washington-Baltimore consolidated MSA #97.	

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

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#### Market Profiles for Areas Receiving Full-Scope Reviews

<a href="#">(Washington-Baltimore, DC-MD-VA-WV consolidated MSA)</a> .....	B-2
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**Washington-Baltimore DC-MD-VA-WV Consolidated Metropolitan Statistical Area**

Demographic Information for Full-Scope Area: Washington-Baltimore DC-MD-VA-WV						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	104	1	8	45	45	1
Population by Geography	535,842	<1	9	42	48	1
Owner-Occupied Housing by Geography	127,232	<1	3	41	56	0
Businesses by Geography	28,088	0	6	43	51	<1
Farms by Geography	764	0	3	29	68	0
Family Distribution by Income Level	139,606	10	15	24	51	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	34,560	<1	20	48	32	0
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$47,608 = \$74,566 = 3.63%	Median Housing Value Unemployment Rate		=\$156,745 = 1.59%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2001 HUD updated MFI.

The bank has one assessment area within the Washington-Baltimore DC-MD-VA-WV consolidated metropolitan statistical area. The assessment area is located entirely within the state of Maryland. The assessment area consists of portions of the Baltimore, Maryland metropolitan statistical area #0720 in Anne Arundel and Howard counties, and portions of the Washington, DC-MD-VA-WV metropolitan statistical area #8840 in Prince George’s and Montgomery counties.

The bank has a total of 18 branches within the assessment area. The bank’s main office is located in Laurel, Maryland in Prince George’s county. Five other branches are in Prince George’s county. Five branches are located in Anne Arundel county, five in Howard county, and two in Montgomery county. All branches have 24-hour ATMs. In addition, the bank has two free-standing cash dispensing ATMs located at Fort Meade.

The assessment area has one census tract that is “NA” for tract characteristics. This is a male correctional facility.

Competition in the bank’s assessment area is very strong. The bank’s major competitors include local savings banks, local large and small community banks, branches of large regional banks and nationwide mortgage and small business lenders. The bank’s business focus is on small and medium sized businesses and individuals seeking to build strong banking relationships with a locally-headquartered institution that has the benefits of a holding company with strong resources.

The economy in the bank’s assessment area is growing. In the suburban Maryland portion of the assessment area, the focus is on the business service industry, health sciences and federal government. The Washington metropolitan statistical area has grown into a large technological hub supporting

telecommunications, biotechnology, and other high-technology fields. The largest employers in the suburban Maryland area include National Institutes of Health, BAE Systems, Giant Food Inc., NASA Goddard Space Flight Center, and the University of Maryland at College Park. Leading industries are the federal government, computer and data processing, grocery stores and miscellaneous business services. In the Washington metropolitan area, the largest employers include Giant Food Corporation, US Airways, Inc., McDonald's Corporation, National Institutes of Health, Marriott International, Verizon Communications, Safeway Stores, Inc., Inova Health Systems, NASA Goddard Space Flight Center, University of Maryland at College Park, and Kaiser Permanente. Leading industries are the federal government, computer and data processing, military personnel, and management and public relations.

Management has identified the need for start up lending to small businesses in the \$25 to \$200 thousand range.

We conducted one community contact for this examination with a local economic development corporation. The contact identified the need for traditional bank financing for very small businesses, which comprise a large portion of the assessment area's businesses, and for equity/venture capital financing for small technology companies.

## 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 MSA/assessment area.

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 MSA/assessment area.
- 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 Refinance Loans** - See Table 2.
- Table 5. 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.
- Table 6. 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. **Not applicable.** Table has been deleted.
- Table 7. 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 MSA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.

- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) 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. **Not applicable.** Table has been deleted.
- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.
- Table 13. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.
- Table 14. Geographic and Borrower Distribution of Consumer Loans** - 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 MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME		State: Maryland				Evaluation Period: January 1, 1998 to June 30, 2001						
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:												
Washington-Baltimore DC-MD-VA-WV consolidated MSA	100	207	19,415	999	86,814	1	7	3	497	1,210	106,733	100

(\*) Rated area refers to either the state or multistate MSA rating area.

(\*\*) The evaluation period for Community Development Loans is April 13, 1998 to September 21, 2001.

(\*\*\*) Deposit data as of June 30, 2000. Rated area refers to either the state or multistate MSA rating area.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		State: Maryland				Evaluation Period: January 1, 1998 to June 30, 2001									
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full-Review:															
Washington-Baltimore DC-MD-VA-WV consolidated MSA	52	100	<1	0	3	2	41	44	56	54	<1	0	0	<1	<1

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

(\*\*) 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.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Geographic Distribution: HOME IMPROVEMENT			State: Maryland				Evaluation Period: January 1, 1998 to June 30, 2001								
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full-Review:															
Washington-Baltimore DC-MD-VA-WV consolidated MSA	110	100	<1	0	3	2	41	54	56	44	2	0	0	2	1

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

(\*\*) 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.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Geographic Distribution: HOME MORTGAGE REFINANCE			State: Maryland				Evaluation Period: January 1, 1998 to June 30, 2001								
MSA/Assessment Area:	Total Home Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full-Review:															
Washington-Baltimore DC-MD-VA-WV consolidated MSA	40	100	<1	0	3	0	41	48	56	52	<1	0	0	<1	<1

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

(\*\*) 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.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.



**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			State: Maryland				Evaluation Period: January 1, 1998 to June 30, 2001								
MSA/Assessment Area:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% of Businesses **	% BANK Loans	% of Businesses **	% BANK Loans	% of Businesses **	% BANK Loans	% of Businesses **	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full-Review:															
Washington-Baltimore DC-MD-VA-WV consolidated MSA	999	100	0	0	6	9	43	57	51	34	1	0	1	2	1

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

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 6. Geographic Distribution of Small Loans to Farms -- Not applicable--Table deleted**

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

Borrower Distribution: HOME PURCHASE			State: Maryland				Evaluation Period: January 1, 1998 to June 30, 2001								
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families **	% BANK Loans ***	% of Families **	% BANK Loans ***	% of Families **	% BANK Loans ***	% of Families **	% BANK Loans ***	Over All	Low	Mod	Mid	Upp
Full-Review:															
Washington-Baltimore DC-MD-VA-WV consolidated MSA	52	100	10	10	15	8	24	17	51	65	<1	<1	0	<1	<1

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

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 2% of loans originated and purchased by the bank.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Borrower Distribution: HOME IMPROVEMENT		State: Maryland					Evaluation Period: January 1, 1998 to June 30, 2001								
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	Over all	Low	Mod	Mid	Upp
Full-Review:															
Washington-Baltimore DC-MD-VA-WV consolidated MSA	110	100	10	20	15	24	24	22	51	34	2	6	2	2	1

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

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Borrower Distribution: HOME MORTGAGE REFINANCE		State: Maryland					Evaluation Period: January 1, 1998 to June 30, 2001								
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	Over all	Low	Mod	Mid	Upp
Full-Review:															
Washington-Baltimore DC-MD-VA-WV consolidated MSA	40	100	10	11	15	21	24	18	51	50	<1	<1	0	<1	<1

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

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 5% of loans originated and purchased by the bank.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		State: Maryland		Evaluation Period: January 1, 1998 to June 30, 2001					
	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Washington-Baltimore DC-MD-VA-WV consolidated MSA	999	100	84	51	82	10	8	1	1

- (\*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.
- (\*\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.
- (\*\*\*) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.
- (\*\*\*\*) Based on 1999 Aggregate Small Business Data only.

**Table 11. Borrower Distribution of Small Loans to Farms -- Not applicable--Table deleted**

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		State: Maryland		Evaluation Period: April 13, 1998 to September 21, 2001					
MA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Review:									
Washington-Baltimore DC-MD-VA-WV consolidated MSA	0	0	93	2,095	93	2,095	100	0	0

- (\*) "Prior Period Investments" means investments made in a previous evaluation period that are outstanding as of the examination date.
- (\*\*) "Unfunded Commitments" means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				State: Maryland				Evaluation Period: MONTH DAY, 19XX TO MONTH DAY, 19XX									
MSA/Assessment Area:	Deposits	Branches				Branch Openings/Closings				Population							
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Review:																	
Washington-Baltimore DC-MD-VA-WV consolidated MSA	100	18	100	0	17	50	33	--	1	--	--	+1	--	<1	9	42	49

**Table 14. Geographic and Borrower Distribution of Consumer Loans**

Geographic and Borrower Distribution: CONSUMER LOANS				State: Maryland				Evaluation Period: January 1, 1998 to June 30, 2001										
MSA/Assessment Area:	Total Consumer Loans		Geographic Distribution								Borrower Distribution							
			Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total**	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans	% of Hhlds*	% BANK Loans
Full-Review:																		
Washington-Baltimore DC-MD-VA-WV consolidated MSA	3,624	100	<1	0	9	6	43	46	48	48	12	24	14	22	22	22	52	32

(\*) Percentage of Households (Hhlds) is based on 1990 Census information.

(\*\*) Consumer loans originated and purchased in the MSA/AA as a percentage of all consumer loans originated and purchased in the rated area.