



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

CORUS Bank, N.A.
Charter Number: 23005

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Office of the Comptroller of the Currency

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NOTE: 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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General Information

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

*This document is an evaluation of the CRA performance of **CORUS Bank, N.A.** prepared by the **Office of the Comptroller of the Currency (OCC)** the institution's supervisory agency, as of **March 6, 2000**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. 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. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States 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 United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA) The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of 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% of the median family income.

Median Family Income (MFI) The median income determined by the United States 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 United States 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% and less than 120% of the MFI.

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

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

Small Farm Loans - Loans with original amounts of \$500 thousand 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 noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Overall CRA Rating

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

The following table indicates the performance level of **CORUS Bank N.A.** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Corus Bank, N.A. 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 substantial majority of loans were made in the bank's assessment area (AA).
- The geographic distribution of loans reflected excellent penetration in low- and moderate-income census tracts in the AA.
- The bank had good penetration of loans among borrowers of different income levels and excellent penetration among businesses of different sizes.
- The level of funding provided for qualified community development projects was excellent.
- The institution had an adequate level of community development investments and grants.
- Delivery systems are accessible to geographies and individuals of different income levels in its AA.
- The institution provided a relatively high level of community development

services.

Description of Institution

CORUS Bank, N.A. (Corus) is a \$2.2 billion intrastate bank whose main office is located in Chicago, approximately 5 miles north of the Chicago Loop. Corus is a wholly-owned subsidiary of CORUS Bankshares, Inc., a \$2.4 billion one-bank holding company, which is also headquartered in the city of Chicago. Local economic conditions are stable and the competition is strong. The bank has eleven branch offices and 32 automated teller machines (ATM). The main office and four branch offices are in the northern portion of the city of Chicago, all within five miles of each other. There is one office in the Loop area of Chicago and five suburban locations (River Forest, Calumet City (2), Wheeling and Niles).

The bank's total assets at December 31, 1999 were \$2.2 billion. The loan-to-deposit ratio increased from 70% at year-end 1998 to 86% at year-end 1999. The average loan-to-deposit ratio for the bank's national peer group was 85%. The majority of Corus' funding is provided through core deposits. Net loans were \$1.7 billion, which is 77% of total assets. The loan mix indicates Corus is largely a real estate lender. Over \$1.1 billion or 65% of the total loan portfolio has a real estate purpose and was comprised of commercial real estate loans (24%), construction and development loans (17%), 1-4 family residential loans (17%) and multifamily loans (7%). Of the 1-4 family residential real estate loans, one-quarter were home equity loans. Loans to individuals were \$466 million (28%) of the total loan portfolio and commercial and industrial loans were \$126 million (6%). Tier 1 Capital was \$166 million or 7.5% of total assets. There are no legal or financial factors that would impede Corus' ability to meet the credit needs of its communities.

Corus is a full service financial institution with its primary lending business focused in four markets: commercial real estate, currency exchange, government-guaranteed student loans and residential real estate loans. Commercial real estate is centered in multi-family rental apartment, hotel and nursing home financing. Corus is the largest provider of services to the currency exchange industry in Chicago, which ultimately provides financial services to the public. Services include clearing, depository and credit services.

During the evaluation period, Corus had ceased originations of residential loans. In 1997, the bank experienced high delinquency and losses in this portfolio, and discontinued new residential loan originations to concentrate on recovery efforts. Corus reevaluated its residential mortgage product line and reentered the market in late 1999. In order to respond to credit and community development needs during this period, the bank undertook efforts to compensate for its expected low volume of residential mortgage loans. Specifically, the bank targeted its qualified investment activities to mortgage-backed securities comprised of loans to low- and moderate-income borrowers. It also maintained relatively high levels of CD lending for purposes of affordable housing.

The bank's competition is strong with large local and regional banks competing for deposits and loans, and national and regional mortgage companies competing for residential mortgage loans.

Scope of the Evaluation

Evaluation Period/Products Evaluated

In evaluating Corus' CRA performance, we considered the bank's CRA activities since the last evaluation, dated February 9, 1998, when the bank received a "Satisfactory" rating. The evaluation period for the Lending Test is January 1, 1998 through December 31, 1999. For the Investment Test and the Service Test, the evaluation period is February 9, 1998 through March 6, 2000.

For the Lending Test, Corus' origination/purchase of home mortgage loans, small business loans, and CD loans were evaluated. The bank made no small farm loans during the evaluation period.

Market data for home mortgage loans and small business loans were considered only for 1998, the most recent year for which the data were publicly available. Because the market data are for a specific year, they may not provide a complete picture of the bank's performance over the evaluation period.

Data Integrity

The Community Reinvestment Act requires that banks, other than small banks, collect and maintain certain data regarding originations and purchases of small business, small farm and HMDA loans. In order to determine the accuracy of loan data presented by the bank, we verified a representative sample of HMDA and small business loans and all of the community development loans made during the evaluation period. No significant errors were detected that would result in a material misrepresentation of the bank's lending activity. The reported data were substantially correct and reliable. We were able to evaluate the bank's lending performance based on accurate data.

Selection of Areas for Full-Scope Review

The bank has one AA consisting of Cook County, Illinois. Cook County is located in the eastern portion of the Chicago MSA (1600) and includes the city of Chicago. We performed a full scope review on this AA. (Refer to the table in Appendix B for detailed information.)

Ratings

The bank's overall rating is based on its performance in its one AA.

Community Contacts/Public Comments

Community contacts made during the examination indicated that there is a need for business loans for both existing and start-up businesses and for residential development projects. The information received from these community contacts was considered in our evaluation.

During the examination, we received public comment letters from community organizations regarding Corus' performance under the CRA. The community organizations raised issues with respect to home mortgage loan volume, the quality of CD lending and qualified investments, the level of CD grants, and the consideration of certain retail deposit services. These comments were considered in our evaluation and our conclusions are described in this document.

In the public comment letters, the community organizations also expressed concerns about financial practices involving predatory lending, payday lending and currency exchange services. We recognize the public policy concerns and reputation risks raised by these comments and have reviewed them in that regard. We have responded separately to the community organizations and discussed the concerns with the bank.

Even though the public comments were not received directly by the bank, we asked the bank to make the comments received by our office available in the bank's CRA public file. Copies of all public comments received by our office are also available at the Office of the Comptroller of the Currency, Central District Office, One Financial Place, Suite 2700, 440 South LaSalle Street, Chicago, IL 60605.

Fair Lending Review

We performed a fair lending review to test the bank's compliance with anti-discrimination laws. We reviewed a sample of loan applications chosen from diverse home loan products offered by the bank to determine compliance with the substantive provisions of the anti-discrimination laws and regulations. No violations were found.

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the Lending Test is rated "High Satisfactory." Our conclusions are based on the following:

- Lending volumes reflected an adequate responsiveness to credit needs in the AA.
- A substantial majority of loans were made in the bank's AA.
- The geographic distribution of loans reflected excellent penetration in low- and moderate-income census tracts in the AA.
- The bank had good penetration of loans among borrowers of different income levels and excellent penetration among businesses of different sizes.
- The level of funding provided for qualified community development projects was excellent and had a positive impact on the lending test rating.

Lending Activity

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

Corus' overall lending activity reflected an adequate level of responsiveness to credit needs in the AA. Due to the bank's chosen business strategy, lending efforts were strongly centered in commercial real estate lending including multi-family, hotel and nursing home financing. Many of these projects have contributed to community development through providing affordable housing or stabilizing low- or moderate-income geographies. Over 9% (\$11 million) of the bank's home mortgage loans were multi-family loans made in its AA.

Information on deposit market share compiled by the FDIC for June 30, 1999 ranked Corus 10th out of 214 FDIC insured financial institutions with offices in Cook County. Corus' deposit market share at 6/30/99 was 1.75%. The bank's overall market rank for 1998 HMDA loans was 332nd out of 925 lenders, with a market share of 0.02%. As previously noted, Corus' overall volume of HMDA loans was low in 1998 because it had temporarily discontinued its residential mortgage product line during this period. Based on 1998 aggregate CRA data, Corus ranked 29th in small business loans out of 270 lenders, with a market share

of 0.60%.

Distribution of Loans by Income Level of the Geography

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 Corus' home mortgage loans was excellent in low- and moderate-income census tracts in the bank's AA.

Home Purchase Loans

The bank's geographic distribution of home purchase loans was excellent in low- and moderate-income census tracts within the bank's AA. During the evaluation period, Corus made 8% of its home purchase loans in low-income census tracts and 38% in moderate-income census tracts. The bank's percentage of home purchase loans substantially exceeded the percentage of owner-occupied units in low- and moderate-income census tracts of 4% and 17% respectively.

According to 1998 aggregate HMDA data, 721 lenders extended home purchase loans in the bank's AA. Corus ranked in the middle, 359th, with a 0.01% market share. The top two lenders were national mortgage companies that had a combined market share of 8%. Corus' market share in low- and moderate-income census tracts of 0.04% and 0.02% exceeded its overall market share for home purchase loans and is considered excellent.

Home Improvement Loans

The bank's geographic distribution of home improvement loans was excellent in low- and moderate-income census tracts within the bank's AA. During the evaluation period, Corus made 4% of its home improvement loans in low-income census tracts and 25% of its home improvement loans in moderate-income census tracts. The bank's percentage of home improvement loans equaled the percentage of owner-occupied units (4%) in low-income census tracts and exceeded the percentage of owner-occupied units (17%) in moderate-income census tracts.

According to 1998 aggregate HMDA data, 328 lenders extended home improvement loans within the bank's AA. Corus ranked 81st in home improvement lending with a 0.11% market share. The bank's market share in moderate-income census tracts equaled its overall market share for home improvement loans, and is considered good. The bank's market share in low-income census tracts was poor since it made no home improvement loans in those areas in 1998.

Refinance Loans

The bank's geographic distribution of refinance loans was excellent in low-income census tracts and good in moderate-income census tracts within the bank's AA. During the evaluation period, Corus made 8% of its refinance loans in low-income census tracts and 15% of its refinance loans in moderate-income census tracts. The bank's percentage of refinance loans substantially exceeded the percentage of owner-occupied units in low-income census tracts (4%) and was near the percentage of owner-occupied units in moderate-income census tracts (17%).

According to 1998 aggregate HMDA data, 722 lenders extended refinance loans in the bank's AA. Corus was in the middle, ranked 362nd with a 0.02% market share. Corus did not make any refinance loans in low-income census tracts during 1998 and only three refinance loans in moderate-income census tracts. This market share of 0.01% was near to its overall market share for refinances and is considered adequate.

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.

Corus' geographic distribution of small business loans within the AA reflected excellent performance when compared to the percentage of small businesses located within the AA. Corus made 271 small business loans totaling \$45.6 million in its AA during the evaluation period. Corus made 11% of its small business loans to businesses located in low-income census tracts. Seven percent of businesses within the AA are located in low-income census tracts. Corus made 35% of its small business loans to businesses in moderate-income census tracts within its AA. Seventeen percent of businesses in the bank's AA are located in moderate-income census tracts. The bank's percentage of small business loans substantially exceeded the percentage of small businesses located in low- and moderate-income census tracts and is considered excellent.

According to 1998 aggregate small business data, 270 lenders extended small business loans in the bank's AA. Corus ranked 29th with a market share of 0.60%. Corus' market share in both low-income (0.90%) and moderate-income (1.30%) census tracts exceeded its overall market share and is considered excellent.

Small Loans to Farms

The bank is located in an urban area where there is little opportunity for farm loans; accordingly, farm lending is not part of Corus' business strategy. The bank did not

make any farm loans during the evaluation period. Therefore, there are no data to present in Table 6 of Appendix C.

Lending Gap Analysis

We performed a lending gap analysis to determine whether there were any conspicuous gaps in the distribution of loans throughout the bank's AA. We concluded that there were no conspicuous gaps in the bank's geographic distribution of loans.

Inside/Outside Ratio

A substantial majority of loans were made in the bank's AA. During the evaluation period, Corus made 399 or 85% of its home mortgage and small business loans, totaling \$69 million, within its AA. Corus made a substantial majority (86%) of its HMDA loans in the AA. The bank made 89% of its home purchase loans, 88% of its home improvement loans, 87% of its refinance loans and 75% of its multifamily loans within its AA. The bank also made a substantial majority (85%) of its small business loans within the AA.

Distribution of Loans by Income Level of the Borrower

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.

Corus' borrower distribution of home mortgage loans is good.

Home Purchase Loans

Home purchase lending reflected an excellent distribution to low-income borrowers and an adequate distribution to moderate-income borrowers. The bank's distribution of home purchase loans to low-income borrowers was 21% and to moderate-income borrowers was 13%. This was substantially near the percentage of low-income families and somewhat lower than the percentage of moderate-income families. The percentage of low- and moderate-income families in the bank's AA is 24% and 19%, respectively.

According to aggregate 1998 HMDA data, the bank ranked 359th out of 721 lenders making home purchase loans in the bank's AA, with an overall market share of 0.01%. Market share for low-income borrowers (0.05%) exceeded the overall market share for home purchase loans and was considered excellent. Market share for moderate-income borrowers equaled the overall market share (0.01%) and was also considered excellent.

Home Improvement Loans

Corus' borrower distribution of home improvement loans was excellent to low-income borrowers. The bank's distribution of home improvement loans to low-income borrowers was 29% and exceeded the percentage of low-income families. The percentage of low-income families in the bank's AA is 24%. Corus' distribution of home improvement loans to moderate-income borrowers was adequate. The bank made 15% of its home improvement loans to moderate-income families. This was somewhat lower than the percentage of moderate-income families (19%) in the bank's AA.

According to 1998 aggregate HMDA data, the bank ranks 81st out of 328 lenders making home improvement loans in its AA with an overall market share of 0.11%. The bank's market share to low-income borrowers was 0.18%. This exceeded the overall market share and was considered excellent. The bank's market share for home improvement loans to moderate-income borrowers was 0.08%. This was somewhat lower than the overall market share and was considered adequate.

Home Mortgage Refinance Loans

Home mortgage refinance lending reflected poor borrower distribution to low-income borrowers and good borrower distribution to moderate-income borrowers. The bank's distribution of home mortgage refinance loans to low-income borrowers was 5% and was much less than the percentage of low-income families. The percentage of low-income families in the bank's AA is 24%. Corus' distribution of home mortgage refinance loans to moderate-income borrowers was good. The bank made 18% of its home mortgage refinance loans to moderate-income borrowers. This was substantially near the percentage of moderate-income families (19%) in the bank's AA.

According to 1998 aggregate HMDA data, the bank's overall market share for home mortgage refinance loans was 0.02%. The bank ranked 362nd out of 722 lenders making home mortgage refinance loans in the bank's AA. The bank's home mortgage refinance lending to low- and moderate-income borrowers was poor. The bank made no home mortgage refinance loans to low-income borrowers and only one loan to a moderate-income borrower in 1998.

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.

The distribution of Corus' loans to small businesses was excellent. Our analysis revealed that 83% of Corus' small loans were to businesses with gross revenues of \$1 million or less. In comparison, 71% of the small businesses in the bank's AA had gross revenues of \$1 million or less. Only 52% of all business loans made by all lenders were to businesses with \$1 million or less in annual gross revenue.

According to the 1998 aggregate small business data, Corus had a 0.61% market share of all reported small business loans and a 0.98% market share of all reported small business loans to businesses with \$1 million or less in annual gross revenue. This was considered excellent.

Small Loans to Farms

The bank made no agriculture loans during the evaluation period. Therefore, there are no data to present in Table 11 of Appendix C.

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.

Corus made a significant contribution to community development in its AA. The level of funding provided for qualified community development projects was excellent and had a positive impact on the lending test rating. The bank made 17 community development loans totaling \$94.4 million during the evaluation period, which represents 57% of Tier 1 Capital. The majority of these loans were for construction or rehabilitation of affordable housing in the form of multi-family apartments and nursing homes. The following is a summary of the community development loans the bank made during 1998 and 1999:

- Loans totaling \$8.4 million were made to construct or rehab six apartment buildings for low- and moderate-income renters.
- Financing for eight nursing home projects totaled \$72.8 million. These loans provided working capital, construction, refinancing and permanent financing for nursing homes in the bank's AA. The nursing homes serve primarily low- and moderate-income individuals and medicaid patients.
- Two loans were made to finance affordable condominiums totaling \$11.7 million. One project converted a run down building in a low-income neighborhood into condominiums that are affordable to low- and moderate-income persons. Another loan provided financing for conversion of a 94-unit apartment building to condominiums. Sixty-four percent of the units are targeted to persons with low and moderate incomes.

- One loan for \$1.5 million was made to revitalize and stabilize the community. This loan was to renovate an office building located in a moderate-income area that had been vacant for 50 years. The renovation was part of a city plan to revitalize its downtown area.

INVESTMENT TEST

The bank's performance under the Investment Test is rated "Low Satisfactory." Our conclusion was based on the following:

- The institution had an adequate level of community development investments and grants. Total investments and grants were \$4.1 million. This level of investment was 2.5% of the bank's Tier 1 Capital.
- The institution exhibited adequate responsiveness to credit and community economic development needs.

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

The bank purchased three separate mortgage-backed securities totaling nearly \$4.0 million in 1999. Each security was comprised of loans to low- and moderate-income borrowers based on the borrower's gross income. Seventy-six percent of the properties were located within the bank's AA. The remaining properties were located in counties adjacent to the bank's AA.

The bank also made donations to organizations that provide community development services within its AA. These donations made during the evaluation period to 18 different organizations totaled \$94 thousand. These donations were to a variety of types of organizations providing health care, shelter, food, job training and child day care to low- and moderate-income individuals and families in the bank's AA.

SERVICE TEST

The bank's performance under the Service Test is rated "High Satisfactory." This conclusion is based on the following:

- Delivery systems were accessible to geographies and individuals of different income levels in its AA.
- The bank had not opened or closed any branch offices during this evaluation

period.

- Services did not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies and/or individuals.
- The institution provided a relatively high level of community development services.

Retail Banking Services:

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

Delivery systems were accessible to geographies and individuals of different income levels in its AA. Corus has eleven branch office locations, and has not opened or closed any branches during this evaluation period. Eighteen percent of the bank's branches are located in moderate-income census tracts, 55% in middle-income census tracts, and 27% in upper-income census tracts. This is near to 25% of the population in moderate-income, 41% in middle-income, and 20% in upper-income census tracts.

Although the bank has no offices in low-income census tracts, six of its branches are readily accessible to low- and moderate-income census tracts within the City of Chicago via public transportation.

The bank has extended hours through its walk-up and drive-through facilities. The bank's service hours, including lobby, walk-up and drive-up hours, cover 7:00 a.m. to 9:00 p.m. six days a week (except for the downtown Chicago branch which is open 8:00 a.m. until 6:00 p.m. Monday through Friday). The bank surveyed the hours of its local competitors and found that no other banks have hours extended until 9:00 p.m. The bank is not open on Sundays. ATMs are available 24 hours a day. There are no differences in the services available at the different locations.

Corus offers alternative delivery services through its 32 ATMs. Each banking facility has at least one ATM, and nine are off-site. Of the 32 ATMs, eight or 25% are in moderate-income, fifteen or 47% are in middle-income, and nine or 28% are in upper-income geographies. This is near to 25% of the population in moderate-income, 41% in middle-income, and 20% in upper-income geographies.

The bank also offers alternative delivery systems of bank-by-phone, bank-by-mail, and Internet Banking services. However, these systems were not given significant weight in our evaluation, since no data were available concerning their impact in low- and moderate-income geographies or to low- and moderate-income individuals.

Community Development Services:

Bank personnel were involved in numerous community service organizations. These organizations provide services to low- and moderate-income individuals in the AA. Services include job training, job placement, shelter, rehabilitation, childcare, health care and other social services.

In addition to serving as board members, bank personnel used their financial expertise to aid these organizations. Examples are as follows:

- A bank officer served on committees for the Lawson House YMCA, a single-occupancy, 583-person residence for low-income individuals on the Near North Side of Chicago. This committee determined the feasibility of opening an ice cream franchise in an effort to provide job training. In addition, this officer participated in the financial decisions and fund raising efforts to install laundry services at the YMCA in order to improve the residents' quality of life.
- Another bank officer is on the board of the Chicago Christian Industrial League (CCIL). CCIL is a social service agency for the homeless in metropolitan Chicago. This officer is currently on the committee to develop a new facility including an expanded Single Room Occupancy (SRO) residence. Corus' involvement with this organization led to the "banking for the homeless" program. This program allows homeless persons to open savings accounts at the bank, requiring no minimum balance or fees. Residents of this facility (approximately 325) are taught how to manage their accounts and how to benefit from saving. During 1999, the bank opened savings accounts for 66 of the residents. Corus is duplicating this program with Hope Village, a SRO for women with families.
- A bank officer serves on the board of West Central Association (WCA). WCA promotes the revitalization of the low- and moderate-income area of the Near West Side of Chicago, including the improvement and development of small business opportunities in this area. Corus became a co-sponsor of their new web-site aimed at informing the local area about the services this organization provides.
- A bank officer is a board member of the Maywood Chamber of Commerce as well as a representative of the Maywood Economic Development Commission. The Chamber and the Commission focus on economic development and revitalization of this low-income area. The Commission considers proposed development projects and requests for various types of financial assistance to

promote small businesses. Their recommendations are forwarded to the Chamber.

- Through involvement with the Erie Neighborhood House, a social development organization for low- and moderate-income residents, the bank participates in the "Pathways to Success" program. This program provides teller training and prepares local residents for jobs in local businesses. The bank has a representative on the panel of bankers who address the trainees.
- Through involvement with Edge Up, the bank participates in the School-to-Work initiative in the low- and moderate-income Uptown and Edgewater areas. Bank employees speak to classrooms, find speakers, and set-up job shadowing at the bank to help students learn more about careers in the financial services industry and how their work in the classroom connects to the world of work.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term Δ Full-Scope Δ) and those that received a less comprehensive review (designated by the term Δ Limited-Scope Δ).

Time Period Reviewed	Lending Test: January 1, 1998 to December 31, 1999 Investment Test: February 9, 1998 to March 6, 2000 Service Test: February 9, 1998 to March 6, 2000	
Financial Institution	Products Reviewed	
CORUS Bank, N.A. (Corus) Chicago, Illinois	HMDA loans, small business loans, community development loans.	
List of AAs and Type of Examination		
AA	Type of Exam	Other Information
MSA 1600 - Cook County	Full-Scope	

Appendix B: Market Profiles for Full-Scope Areas

Demographic Information for Cook County, Illinois in eastern portion of MSA 1600						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,352	20.12	25.15	35.58	17.46	1.70
Population by Geography	5,105,067	13.60	25.08	40.93	20.34	0.05
Owner-Occupied Housing by Geography	1,042,793	4.32	17.17	50.37	28.14	0.00
Businesses by Geography	167,776	7.01	16.95	39.71	34.29	2.03
Farms by Geography	1,566	2.11	9.71	48.40	39.08	0.70
Family Distribution by Income Level	1,256,554	24.09	18.53	23.22	34.16	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	535,533	22.52	32.99	36.26	8.24	0.00
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$42,758 = \$63,800 = 10.43%	Median Housing Value Unemployment Rate				= \$108,960 = 4.55%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 1999 HUD updated MFI.

Corus' AA is Cook County, Illinois. Cook County is a densely populated urban area comprised of 134 municipalities, including the city of Chicago with a population of 2.8 million. The area consists of 1,352 census tracts. According to the 1990 census information, 20% of the census tracts are low-income, 25% are moderate-income, 36% are middle-income, 17% are upper income and 2% do not have an income level designation. The low- and moderate-income census tracts are primarily concentrated in the city of Chicago, surrounding downtown and extending to the suburbs south and west of the central business district. The AA complies with the technical requirements of the CRA and does not arbitrarily exclude any low- or moderate-income geographies or illegally discriminate.

The total population of the AA is 5,105,067 based on the 1990 census data. The population distribution in the AA is as follows: 14% live in low-, 25% live in moderate-, 41% live in middle- and 20% live in upper-income census tracts. There are 1,256,554 families in the AA. The 1999 MSA updated median family income is \$63,800. This income figure is the basis for determining the low- moderate- middle- and upper-income level of families. The family breakdown by income level in the bank's AA is 24% low-income families, 19% moderate-income families, 23% middle-income families and 34% upper-income families.

There are 2,021,833 housing units in the AA, fairly evenly split between owner-occupied (52%) and renter-occupied (41%). However, the majority (78%) of owner-occupied units are located in middle- and upper-income census tracts while a majority (53%) of renter-occupied units are located in low- and moderate-income census tracts. Only 4% and 17% of the owner-occupied units are located in low- and moderate-income census tracts, respectively. For renter-occupied units, 21% and 32% are located in low- and moderate-income census tracts, respectively.

The major industry in Cook County is services (45%), followed by retail trade (19%), manufacturing (7%) and construction (7%). The majority of businesses are small businesses. Of the approximately 168,000 businesses, 71% have less than \$1 million in gross annual revenues and 62% have gross annual revenues of less than a half-million dollars. Twelve percent of businesses have gross annual revenues in excess of \$1 million and income information for the remaining 17% of the businesses is unknown or not reported. Only 5% of the businesses have more than 50 employees and 58% have less than 5 employees. Seven percent of the businesses are located in low-income census tracts and 17% are located in moderate-income census tracts.

Competitive Factors within the AA

The local economy is stable and competition is strong. According to the 1998 Home Mortgage Disclosure Act (HMDA) information, 721 lenders made home purchase loans in the bank's AA. Loan originators included regional and money center banks, national mortgage companies and local financial institutions. Corus competes with large regional and local banks such as Bank One, N.A., LaSalle Bank National Association, Northern Trust Company, Harris Trust and Savings Bank, American National Bank and Trust Company of Chicago and Cole Taylor Bank. According to the FDIC Institution Directory as of February 24, 2000, Bank One is the largest bank in Cook County with \$85.9 billion in total assets and Corus is the 7th largest with \$2.2 billion in total assets.

Credit Needs

Credit and community development needs were identified in Cook County over the past 18 months through meetings with 8 community development organizations, 3 public meetings, published documents, academic studies and a Credit Needs Assessment Report of the Federal Home Loan Bank. Some of these identified credit needs are small business loans and working capital lines of credit, financing for affordable single family and multi-family housing projects, combination purchase and rehab loans for single family housing, flexible purchase and rehab loans for mixed-use properties with fewer than 6 units and financial institution purchase of low-income housing tax credits issued for specific development projects. In addition, business planning assistance, financial education for persons without a banking relationship, especially people making the transition from welfare to work,

job training, grants and donations to nonprofit organizations, financial expertise on nonprofit boards of directors and committees and home buyer counseling were identified needs. There are 247 identified organizations that serve the community development needs in Cook County. Nearly all of them are non-profits targeted to a specific neighborhood although seven are statewide.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the bank include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/AA; 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/AA.

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/AA.
- 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 rank and 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 rank and 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 rank and market share information based on the most recent aggregate market data available.

- 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/AA. The table also presents market rank and 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 thousand) 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.
- 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 (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 the population 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/AA.

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Table 1. Lending Volume

LENDING VOLUME												
Evaluation Period 01/01/1998 TO 12/31/1999												
	% of Rating Area Deposits in AA *	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in AA (% of #)
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
MSA/AA												
Full Scope												
Corus	100.00	128	23,625	271	45,571	0	0	17	94,411	416	163,607	100.00

* Deposit Data as of June 30, 1999

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Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Evaluation Period 01/01/1998 TO 12/31/1999														
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Home Purchase Loans		
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Corus	4	8	17	38	50	42	28	13	359	0.01	0.04	0.02	0.01	0.01	24	100

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

** Home purchase loans within an MSA/AA as a % of all home purchase loans in the rating area.

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Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Evaluation Period 01/01/1998 TO 12/31/1999														
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Home Improvement Loans		
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope	4	4	17	25	50	52	28	19	81	0.11	0.0	0.1	0.13	0.2	52	100
Corus																

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

** Home improvement loans within an MSA/AA as a % of all home improvement loans in the rating area.

Charter Number 10000023005

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Evaluation Period 01/01/1998 TO 12/31/1999															
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans		
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mld	Upp	#	% of Total**	
Full Scope																	
Corus	4	8	17	15	50	60	28	18	362	0.02	0.0	0.01	0.0	0.0	40	100	

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

** Refinance loans within an MSA/AAA as a % of all refinance loans in the rating area.

Charter Number 10000023005

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL BUSINESS		Evaluation Period 01/01/1998 TO 12/31/1999														
MSA/Assessment Area	Low Income Geographies	Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Small Business Loans			
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses		% Bank Loans	Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Corus	7	11	17	35	40	32	34	21	29	0.6	0.9	1.3	0.5	0.4	271	100

* Based on 1998 Aggregate Small Business Data Only only. Market rank is for all income categories combined.

** Small Business loans within an MSA/AA as a % of all Small Business loans in the rating area.

Charter Number 10000023005

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL FARM		Evaluation Period 01/01/1998 TO 12/31/1999															
		Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*		Market Share by Geography*		Total Loans Small Farm Loans			
MSA/Assessment Area	% of Farms	% Bank Loans		% of Farms		% of Farms		% of Farms		Overall Market Rank*	Overall	Low	Mod	Mid	Upp	#	% of Total**
		Full Scope															
Corvus	2	0	0	10	0	48	0	39	0	0	0.0	0.0	0.0	0.0	0.0	0	0

* Based on 1998 Aggregate Small Business Data Only only. Market rank is for all income categories combined.

** Small Farm loans within an MSA/AAA as a % of all Small Farm loans in the rating area.

Charter Number 10000023005

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMDA HOME PURCHASE		Evaluation Period 01/01/1998 TO 12/31/1999														
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*				Total Home Purchase Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope	24	21	19	13	23	13	34	33	359	0.01	0.05	0.01	0.01	0.02	24	100
Corus																

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

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

Charter Number 10000023005

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Evaluation Period 01/01/1998 TO 12/31/1999														
MSA/Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*				Total Home Improvement Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope	24	29	19	15	23	29	34	25	81	0.11	0.18	0.08	0.14	0.13	52	100
Corus																

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

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

Charter Number 10000023005

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Evaluation Period 01/01/1998 TO 12/31/1999														
MSA/Assessment Area	Low Income Families		Moderate Income Families		Middle Income Families		Upper Income Families		Overall Market Rank*	Market Share by Borrower Income*				Total Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope	24	5	19	18	23	25	34	35	362	0.02	0.0	0.0	0.01	0.02	40	100
Corus																

* Based on 1998 Aggregate HMDA Data Only. Market rank is for all income categories combined.

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

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Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL BUSINESS		Evaluation Period 01/01/1998 TO 12/31/1999								
MSA/Assessment Area	Businesses With Revenues of \$1 million or less			% Distribution of Loans by Original Amount of Business Size		Market Share*		Total Small Business Loans		
	% Business**	% Bank Loans***	% Market Loans*	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
Full Scope										
Corus	71	83	52	53	28	20	0.61	0.98	271	100

* The market consists of all other Small Business reporters in BANK's assessment area and is based on 1998 Aggregate Small Business Data Only only

** Businesses with revenues of \$1 million or less as a percentage of all businesses.

*** Loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No revenue information was available for XX% of small loans to businesses reported by the BANK.

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Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL FARM		Evaluation Period 01/01/1998 TO 12/31/1999						
MSA/Assessment Area	Businesses With Revenues of \$ 1 million or less		% Distribution Loans by Original Amount Regardless of Farm Size		Market Share*		Total Small Farm Loans	
	% Farms**	% Bank Loans***	\$100,000 or less	> \$100,000 to \$250,000	All	Rev \$ 1 Million or Less	#	
Corus	91	0	0	0	0.0	0.0	0	
Full Scope								
							0	

* The market consists of all other Small Farm reporters in BANK's assessment area and is based on 1998 Aggregate Small Business Data Only only

** As a Percentage of Farms with Known revenues.

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

Charter Number 10000023005

Table 12. Qualified Investments

QUALIFIED INVESTMENTS		Evaluation Period 01/01/1998 TO 12/31/1999							
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investment		Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Scope									
Cortus	0	0	21	4,094	21	4,094	100.00	0	0

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

** "Unfunded Commitments" means legally binding commitments reported on Report of Condition Schedule L-"Off-Balance Sheet Items".

Charter Number 10000023005

Table 13. Distribution of Branch Delivery System

DISTRIBUTION OF BRANCH DELIVERY SYSTEM		Evaluation Period 01/01/1998 TO 12/31/1999														
MSA/Assessment Area	Deposits % of Total Bank Deposits	Branches			Branch Openings/Closings			Population with Each Geography*								
		# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)			# of Branch Openings	Net gain(+) / loss(-) of branches due to openings/closings			% of the Population with Each Geography*					
				Low (%)	Mod (%)	Upp (%)		Low	Mod	Upp	Low	Mod	Mid	Upp		
Full Scope	100.00	11	100.00	0.00	18.18	54.55	27.27	0	0	0	0	0	13.60	25.08	40.93	20.34

* The percentage of the population in the MSA/AA that resides in these geographies.