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Comptroller of the Currency  
Administrator of National Banks

LARGE BANK

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## Public Disclosure

June 30, 1999

# Community Reinvestment Act Performance Evaluation

Bank One Louisiana, N.A.  
Charter Number: 13655

451 Florida Street  
Baton Rouge, LA 70801

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 **Bank One Louisiana, NA** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **June 30, 1999**. 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.

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**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 refinancings 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.

**Operating Subsidiary** - Corporations, limited liability corporations or similar entities in which the bank has control through 50% or greater ownership. Bank's may establish or acquire such entities to conduct activities that are part of or incidental to the business of banking.

**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 Bank One, Louisiana, NA (BOLA) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Bank One, Louisiana, NA Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		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:

- The bank’s volume of lending was good. Overall volumes of lending were good for both home mortgage products and small loans to businesses.
- The geographic distribution of lending by income level of geography was adequate. Performance varied by loan product and market ranging from excellent to poor. Small business lending has an overall good geographic distribution.
- The distribution of lending by income level of borrower was adequate. The bank’s performance for all home mortgage products was adequate. The bank’s performance in small business lending could not be assessed due to the lack of information.
- The bank offers an adequate level of innovative or flexible lending programs. By offering an array of different products and programs the bank is helping to meet the consumer and commercial credit needs within their communities.



- The volume of lending inside versus outside of the assessment area shows a strong focus on serving the credit needs of the bank's chosen market. The bank has an excellent record of lending within its assessment areas.
- The bank's overall level of community development lending was adequate. The level of community development lending done in some of the limited-scope assessment areas positively contributed to the bank's overall community development lending conclusion. The bank's performance levels varied from excellent (in some limited-scope areas) to no community development loans being made in several assessment areas.
- The bank has a good volume of qualified investments, and the investments are responsive to the identified needs of affordable housing and economic development.
- Adequate access to banking services is provided by the bank's branch network and other retail delivery mechanisms. Community development services are at least generally provided to each of the bank's assessment areas.

## **Description of Institution**

BOLA, headquartered in Baton Rouge, Louisiana, is a wholly owned subsidiary of Bank One Corporation (BOC), which is headquartered in Chicago, Illinois. As of June 30, 1999, Bank One Corporation had total assets of \$256 billion making it the fifth largest bank holding company in the United States. BOC offers a full range of consumer and commercial financial products and services and operates banking offices in 14 states: Arizona, Colorado, Florida, Illinois, Indiana, Kentucky, Louisiana, Michigan, Ohio, Oklahoma, Texas, Utah, West Virginia and Wisconsin. The Corporation operates more than 2,000 banking centers and 6,000 ATM's nation-wide. It has subsidiaries in 33 states and international offices on five continents.

BOLA is the second largest bank in Louisiana. As of June 30, 1999, BOLA reported total assets of \$13 billion, total loans of \$7.3 billion, and a loan-to-deposit ratio of 71%. Tier 1 capital totals \$799 million. Within its assessment areas, the bank has 224 branches and 318 deposit-taking automatic teller machines (ATMs) throughout the state of Louisiana. As of June 30, 1999, BOLA's loan portfolio consisted of 45% of real estate loans, 25% consumer loans, 23% commercial loans, 1% agriculture loans, and 6% other loans.

In determining the size and capacity of BOLA for CRA evaluation purposes, we specifically considered operating subsidiaries of the bank. None of the bank's operating subsidiaries contributes to or detracts from the CRA performance of the bank.

There are no significant financial barriers limiting BOLA's ability to help meet the identified credit needs of its assessment areas.

There were seven affiliated, non-bank entities that contributed to the bank's CRA performance. Refer to Appendix A for identification of the entities and the activities they contributed.

At present, BOLA's market area consists of all or parts of eight Metropolitan Statistical Areas (MSAs), and five assessment areas in non-metropolitan parts of the state. All of the assessment areas are within the State of Louisiana. The bank's assessment areas include:

- 1) Alexandria MSA (added November 1998)
- 2) East Baton Rouge Parish within the Baton Rouge MSA
- 3) Houma MSA
- 4) The southwestern portion of the Lafayette MSA
- 5) Lake Charles MSA
- 6) The northeastern portion of the New Orleans MSA
- 7) Monroe MSA
- 8) The western portion of the Shreveport MSA
- 9) Lincoln, Union, Morehouse, and Claiborne Parishes
- 10) Iberia and St. Mary Parishes
- 11) Jefferson Davis Parish
- 12) Natchitoches Parish
- 13) Tangipahoa Parish

Several of the bank's assessment areas changed during the evaluation period due to the acquisition of First Commerce Corporation and related bank mergers. For purposes of this evaluation, the changes were considered effective November 1998. The changes to the assessment areas included: the addition of the Alexandria MSA; the addition of Ascension Parish to the Baton Rouge assessment area; the addition of St. Landry Parish in the Lafayette assessment area; the addition of St. Charles and St. John the Baptist parishes in the New Orleans assessment area; the addition of two census tracts in Beauregard Parish;

the addition of Grant Parish; and the addition of Vermillion Parish to non-metropolitan areas.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The last evaluation of the bank is dated September 19, 1996 and included performance elements through December 14, 1996. This evaluation assessed the bank's performance from December 14, 1996 to June 30, 1999. The Lending Test considers information from January 1, 1997 to June 30, 1999. Home-purchase loans, home-improvement loans, refinanced loans, small business and small farm loans were reviewed in conjunction with the Lending Test. The evaluation period for the Investment and Service Tests is December 14, 1996 to June 30, 1999. Community-development loans, community-development investments, community-development services, retail banking locations and retail banking services were reviewed in conjunction with these tests.

### **Selection of Areas for Full-Scope Review**

We selected a sample of bank assessment areas for full-scope reviews and the remaining assessment areas were reviewed in a more limited manner. The data contained in the tables in Appendix C was evaluated for each bank assessment area and this data was factored into our conclusions. However, for full-scope assessment areas additional information was developed concerning credit and community development needs, and opportunities for community development activities. The analysis of the bank's performance in full-scope areas was expanded to include a detailed analysis of the geographic distribution of lending. Also, individual community development loans and services and qualified investments were reviewed to assess qualitative factors such as complexity, innovation, leadership and responsiveness to identified needs. The Service Test included analysis of the location of bank branches to gauge accessibility.

Assessment areas receiving full-scope reviews were New Orleans with 41.6% of the bank's deposits, Lafayette with 9.7% of the bank's deposits, Shreveport with 7.8% of the bank's deposits, and Lincoln with 2.6% of the bank's deposits. New Orleans, Lafayette, and Shreveport are Metropolitan Statistical Areas and Lincoln is a non-metropolitan assessment area.

Assessment areas receiving limited-scope reviews were Alexandria, Baton Rouge, Houma, Lake Charles, Monroe, Iberia and St. Mary, Jefferson Davis, Natchitoches, and Tangipahoa. The Iberia, Jefferson Davis, Natchitoches, and Tangipahoa assessment areas are located in non-metropolitan areas of the state. The tables in Appendix C present the data for these non-metropolitan assessment areas on a combined basis, and that is how the bank's performance in these assessment areas was analyzed. The data for the Lincoln non-metropolitan assessment area is detailed separately in the tables since this area received a full-scope review.

### **Data Integrity**

The scope of this examination included a review of the accuracy of the bank data analyzed to develop our conclusions and ratings. The data tested for accuracy includes information made available to the public in accordance with the Home Mortgage Disclosure Act (HMDA) and the CRA regulation. Public data includes home mortgage lending and small loans to businesses and farms. We also reviewed the accuracy of non-public data for qualified investments, community development services, and community development loans. The test was performed at the corporate level and included all Bank One affiliated banks reporting data. Therefore the percentages quoted here would be for the entire corporation, and may vary for a particular Bank One subsidiary.

The bank's HMDA data was found to be accurate. No material errors were noted with the home purchase, home improvement, or refinance loans reported by the bank.

Several errors were found in the bank's 1998 small loans to businesses submission. The material errors noted were:

- Commercial leases were incorrectly reported as loans. Incorrectly reported leases represented 1.9% of the loan submitted.
- Guidance lines of credit were incorrectly reported as loans. Incorrectly reported guidance lines of credit represented 3.8% of the loans submitted.
- Revenue data was in error for 17% of our sample.

Management was able to remove the commercial leases from the data provided to the examiners. The data for the entire evaluation period was corrected. The correction of the data for guidance lines of credit did not cover the entire evaluation period. Management removed 149 guidance lines totaling \$32 million

from the 1998 data, but was unable to identify guidance lines in the 1997 data. We therefore estimate that the small loans to businesses in this report are overstated by 196 loans or 4.2% of the reported number of loans and \$40 million or 8.9% of the total reported dollar. Due to the corrections made, the data analyzed as part of this examination will differ from the data publicly reported. The revenue information reported for small loans to businesses was not corrected and we did not analyze the bank's performance in lending to small businesses in this evaluation.

The data for small loans to farms was not verified. These loans were not analyzed in this evaluation. The volume of this type of lending was modest and would not have affected the lending conclusions. The information on small loans to farms is presented in Tables 1, 6 and 11.

### **Other**

We utilized several different methods to assist us in identifying credit and community development needs within the full-scope assessment areas. We reviewed a variety of contacts with community-based organizations made by examiners of various regulatory agencies during the evaluation period. This included a review of 15 contacts made by five housing organizations, three small business organizations, two activist groups, two real estate agencies, two multi-purpose redevelopment groups, and one individual who discussed employment opportunities. In addition, we met with three community organizations during the examination in New Orleans, three organizations in Lafayette, and five community organizations in Shreveport. These 11 contacts held during the examinations were comprised of six housing groups, four multi-purpose redevelopment groups, and one activist group.

We discovered an overwhelming agreement in the need for affordable housing throughout all of the assessment areas. Specific needs with each of the assessment areas are addressed in Appendix B to this report.

## **Fair Lending Review**

We performed an analysis of home improvement and home mortgage refinance lending in Louisiana in order to test for disparate treatment of Blacks and Hispanics in mortgage lending. These products and the target populations were selected based upon an analysis of denial disparities in Home Mortgage Disclosure Act (HMDA) information. Our examination included a statistical analysis of HMDA information and the bank's electronic underwriting database. The statistical

analysis was used to select a sample of approved and denied applications that were reviewed manually to test for disparate treatment. We concluded that there was no disparate treatment on an illegal basis and thus no illegal discrimination.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

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

The bank's Lending Test performance was adequate.

#### **Lending Activity**

BOLA's overall volume of lending is good in New Orleans, Lafayette, and Shreveport, and is adequate in Lincoln. In our analysis of home mortgage lending performance more weight was given to performance in home improvement lending as this is a more significant product line in the bank's business strategy.

Refer to Table 1 in Appendix C for the data used in this analysis.

In each of the full-scope assessment areas, BOLA has the number one deposit market share position.

The volume of home mortgage lending in New Orleans is good. In New Orleans the bank's volume of home improvement and refinancing lending is good as the bank achieved the number two market share ranking for both lending products. The bank's volume of home purchase loans is adequate with a market share rank of sixth.

In Lafayette, the volume of home mortgage lending is good. For home improvement lending the bank's performance is good having achieved the number two market share ranking. For refinance lending, the bank's performance is excellent having achieved the number one market share ranking. The bank's volume of home purchase loans is poor with its market share ranking for home purchase loans substantially below its deposit market share rank.

The volume of home mortgage lending in Shreveport is good. In Shreveport, home improvement and refinancing lending is good as the bank achieved the number two market share ranking for both lending products. The bank's volume of home purchase loans is poor with the bank's market share rank for home purchase loans substantially below its deposit market share rank.

In Lincoln, the overall volume of home mortgage lending is adequate with home improvement lending being good as the bank's home improvement market share

ranking is close to the bank's deposit market share ranking. The bank's volume of home purchase and refinancing lending is adequate in the Lincoln assessment area.

The volume of small business lending is excellent in Lafayette and Shreveport with the bank achieving the number one market share ranking. In Lincoln, the bank's volume of small business lending is excellent as the bank achieved the number two market share ranking for small loans to businesses. The bank's volume of small loans to businesses is good in New Orleans. This conclusion considers the over reporting of small business loans to businesses as discussed in the Scope section of this evaluation under Data Integrity.

Overall, the bank's volume of community development lending is adequate in Lafayette and poor in Shreveport and New Orleans. There were no community development loans made in the Lincoln assessment area. To help gauge the volume of community development lending in individual assessment areas, the volume of community development loans was calculated as a percentage of Tier 1 capital. This calculation involved allocating Tier 1 capital to each assessment area based on the percentage of the bank's deposits derived from that assessment area. The volume of community development loans represented 2.4% in Lafayette, 0.5% in New Orleans, and 0.4% in Shreveport. Additional details on BOLA's community development lending is provided later in this evaluation.

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

The distribution of loans by income level of geography is adequate. Performance is adequate in New Orleans, poor in Lafayette, and good in Shreveport and Lincoln.

We did not find any conspicuous gaps in the bank's lending patterns for the assessment areas that received full-scope reviews. During the evaluation period, there were no clusters of low- or moderate-income census tracts that were not penetrated by at least one of the bank's home purchase, home improvement, home refinance, or small business loan products.

During our analysis, it was noted several times that the bank's lending performance in low- and moderate-income census tracts, as measured by the percentage distribution of loans, was not consistent when compared to the bank's market share performance in the corresponding areas. The percentage of distribution data was given more weight since it covers a longer time period, as the market share information is for 1998 only. In addition to the different time periods used for these two measures, the market share data may be a reflection of weak performance in low- and moderate-income areas by all financial institutions.



## Home Mortgage Loans

Refer to Tables 2, 3, and 4 in Appendix C for the data used in this analysis.

The geographic distribution of home purchase loans is good in Lincoln, adequate in New Orleans and Shreveport, and poor in Lafayette.

The geographic distribution of home purchase lending in Lincoln is good with the percentage of loans made in the moderate-income areas being near the percentage of owner-occupied housing units for the area. The market share penetration is excellent compared to the bank's overall market share percentage in the Lincoln assessment area, which exceeds the bank's overall home purchase market share position in Lincoln. With more weight given to the bank's percentage of distribution of loans, the overall conclusion in regards to the geographic distribution of home purchase loans in Lincoln is good.

For home purchase loans the distribution of loans is good in low-income census tracts in New Orleans with the percentage of bank's loans made in the area being near the percentage of owner-occupied housing units in the area. The market share penetration is excellent as the analysis reflects a percentage in low-income areas that exceeded the bank's overall market share percentage for home purchase loans in New Orleans. With more weight given to the bank's distribution of loans, the overall performance with regards to the geographic distribution of home purchase loans in low-income areas of New Orleans is good. In moderate-income areas of New Orleans, the bank's performance for geographic distribution of home purchase loans is poor, with the percentage of bank loans made significantly below the percentage of owner-occupied units for the area. Market share penetration in moderate-income areas of New Orleans is also poor with a market share percentage significantly below the bank's overall market share percentage for home purchase loans. Combined, the geographic distribution of home purchase loans in low- and moderate-income areas of New Orleans is adequate.

The bank's home purchase geographic distribution performance in low-income areas of Shreveport is poor with the percentage of loans made significantly below the percentage of owner-occupied housing units. The bank's market share for home purchase loans in low-income areas is excellent as the percentage exceeds the bank's overall market share percentage for the Shreveport assessment area. Giving more weight to the bank's distribution of loans, the geographic distribution

of home purchase loans to low-income areas in Shreveport is adequate. The bank's good home purchase loan distribution to moderate-income areas of Shreveport is reflected in the percentage of bank loans made being near the percentage of owner-occupied housing units for the assessment area. The bank's good distribution performance in the moderate-income areas of Shreveport is further supported with an excellent market share ratio that significantly exceeds the bank's overall market share percentage for home purchase loans in the Shreveport assessment area. With more weight given to the bank's loan distribution performance the overall performance for geographic distribution of home purchase loans in moderate-income areas of Shreveport is good. Giving more weight to the bank's loan distribution performance factors the overall geographic distribution of home purchase loans to low- and moderate-income areas of Shreveport is adequate.

The bank's market share for home purchase loans in low-income areas of Lafayette is excellent as it significantly exceeds the bank's overall market share for the area. However, the bank's distribution percentage of home purchase lending in low-income areas is poor. Overall, giving more weight to the bank's distribution of loans, the geographic distribution of home purchase loans in low-income areas of Lafayette is adequate. In moderate-income areas of Lafayette, the bank's distribution of home purchase lending and market share penetration are poor with percentages significantly below both the percentage of owner-occupied housing units in the area and the bank's overall market share percentage for home purchase loans in Lafayette. With more weight given to the bank's loan distribution performance and with a higher percentage of the owner-occupied housing units in moderate-income census tracts, the overall performance for the geographic distribution of home purchase loans in Lafayette is poor.

For home improvement loans, the geographic distribution is adequate in New Orleans and Lafayette, good in Shreveport, and excellent in Lincoln.

The geographic distribution of home improvement loans is adequate in both low- and moderate-income areas of New Orleans. The bank's percentage of loans made in each area is close to the percentage of owner-occupied housing units for each area. The bank's market share analysis reflects poor performance in low-income areas and adequate performance in moderate-income areas of New Orleans. With more weight given to the bank's loan distribution, the overall conclusion in regards to geographic distribution of home improvement loans in New Orleans is adequate.

In low-income areas of Lafayette the bank's distribution of home improvement

loans is excellent and the market share percentage in low-income census tracts significantly exceeds the bank's overall market share in the Lafayette assessment area. In moderate-income areas of Lafayette, the bank's distribution of home improvement loans and market share penetration is poor with percentages significantly below the percentage of owner-occupied housing units and the percentage of the bank's overall market share for home improvement loans. With more weight given to the bank's loan distribution performance and with a higher percentage of owner-occupied housing units in moderate-income census tracts, the overall performance in regards to geographic distribution of home improvement loans in Lafayette is adequate.

While the distribution of home improvement loans in low-income areas of Shreveport is adequate, the bank's market share penetration is excellent as the market share percentage in low-income areas exceeds the bank's overall market share percentage in the Shreveport assessment area. Overall, geographic distribution of home improvement loans in low-income areas of Shreveport is good. In moderate-income areas of Shreveport the bank's distribution of home improvement loans is good and market share penetration is excellent. The percentage of loans made in moderate-income areas of Shreveport is near the percentage of owner-occupied units for the area. The home improvement market share percentage is excellent in moderate-income areas of Shreveport as the ratio matches the bank's overall market share percentage for home improvement loans in the Shreveport assessment area. Giving more weight to the bank's loan distribution performance the overall geographic distribution of home improvement loans in moderate-income areas of Shreveport is good.

In Lincoln, the geographic distribution and market share penetration of home improvement loans is excellent for moderate-income census tracts. The bank's percentage of home improvement loans made in moderate-income areas exceeds the percentage of owner-occupied housing units, and the market share percentage in moderate-income areas exceeds the bank's overall home improvement market share percentage for the Lincoln assessment area.

Geographic distribution for refinancing loans is poor in New Orleans, adequate in Lafayette and Shreveport, and good in Lincoln.

In New Orleans, the distribution of refinancing loans in low-income areas is poor with percentages of loans made significantly below the percentage of owner-occupied housing units. The bank's market share percentage is adequate and is close to the bank's overall market share position for refinancing loans. With more weight on the bank's loan distribution performance, the overall geographic

distribution of refinancing loans in low-income areas of New Orleans is poor. In moderate-income areas of New Orleans the distribution of refinancing loans is also poor, while the market share penetration is adequate with the market share percentage being close to the bank's overall market share percentage for refinancing loans in New Orleans. With more weight being given to the bank's distribution of loans, the overall conclusion in regards to the bank's geographic distribution of refinancing loans in moderate-income areas of New Orleans is poor.

In Lafayette the geographic penetration of refinancing loans in low-income areas is adequate, however the market share analysis reflects excellent performance with the market share percentage in low-income areas significantly exceeding the bank's overall market share percentage for the Lafayette assessment area. Overall, the bank's geographic distribution of refinancing loans to low-income areas in Lafayette is good. The distribution of refinancing loans and market share penetration in moderate-income areas in Lafayette is poor. The percentages of bank loans made and market share are significantly below the percentage of owner-occupied housing units and the bank's overall market share position for refinancing loans in moderate-income areas of Lafayette. With more weight given to the bank's loan distribution performance and with more owner-occupied housing units located in the moderate-income areas the bank's overall performance in regards to distribution of refinancing loans to low- and moderate-income areas of Lafayette is adequate.

In Shreveport, geographic distribution of refinancing loans in low-income areas is poor. The percentage of loans made is significantly below the percentage of owner-occupied housing units for refinancing loans in Shreveport. The bank's market share percentage for refinancing loans in low-income areas of Shreveport is also poor because the bank's market share of refinancing loans in low-income areas is less than the bank's overall market share for refinancing loans. In moderate-income areas of Shreveport, the distribution of refinancing loans is adequate while the market share penetration is excellent with the market share percentage in moderate-income areas significantly exceeding the overall market share percentage for the Shreveport assessment area. The overall conclusion in regards to the bank's geographic distribution of refinancing loans in moderate-income areas in Shreveport is good. Combined, the bank's overall performance for geographic distribution of refinancing loans to low- and moderate-income areas in Shreveport is adequate.

While the geographic distribution of refinancing loans in the Lincoln moderate-income census tracts is adequate, the market share penetration is excellent as the percentage substantially matches the overall market share percentage in the

Lincoln assessment area. The overall geographic distribution of refinancing loans in Lincoln is good.

### **Small Business Loans**

Refer to Table 5 in Appendix C for the data used in this analysis.

The geographic distribution of small loans to businesses is excellent in Shreveport, good in New Orleans, adequate in Lincoln, and poor in Lafayette.

The percentage of the bank's loans exceeded the percentages of small businesses located in both low- and moderate-income areas in Shreveport. In addition, market share penetration in low-income areas is good with the percentage being near to the bank's overall small loans to business market share in the Shreveport assessment area. The bank's small loans to businesses market share position is excellent in the Shreveport moderate-income areas with the percentage exceeding the percentage of the bank's overall small loans to business market share.

The bank's loan distribution in both low- and moderate-income areas of New Orleans is good for small loans to businesses. In New Orleans the percentage of the bank's loans were near the percentage of small businesses in both low- and moderate-income areas. In low-income areas, the bank's market share percentage exceeded the bank's overall small loans to business market. The bank's market share percentage in moderate-income areas matched the bank's overall market share percentage for small loans to businesses. With more weight given to the bank's loan distribution performance, the overall geographic distribution of small loans to businesses in both low- and moderate-income areas of New Orleans is good.

The bank's percentage of small loans to businesses and market share position is adequate with percentages being close to the percentage of small businesses and the bank's overall market share position in Lincoln.

The bank's geographic distribution in both low- and moderate-income areas of Lafayette is poor for small loans to businesses. The bank's percentage of loans made in both low- and moderate-income areas is significantly below the percentage of small businesses in the Lafayette assessment area. While the market share percentage in low-income areas in Lafayette is adequate, the market share percentage in moderate-income areas is poor in relation to the bank's overall market share percentage. With more weight given to the bank's distribution of loans, the bank's overall performance on the geographic distribution of small loans

to businesses in Lafayette is poor.

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

The distribution of loans by borrower income level is good in New Orleans and Shreveport and adequate in Lafayette, and Lincoln.

During our analysis it was noted several times that the bank's lending performance, as measured by percentage of loans to low- and moderate-income borrowers, was not consistent when compared to the bank's corresponding market share performance. This inconsistency is probably caused by the fact that market share data is for just one year. The borrower distribution performance data was given more weight since it covers a longer time period.

With more weight given to the bank's loan distribution performance, the overall distribution of loans by income level of borrower is adequate.

### **Home Mortgage Loans**

Refer to Tables 7, 8, and 9 in Appendix C for the data used in this analysis.

Demographic data related to the percentage of low-income families living below the poverty level was taken into consideration in reaching conclusions on the bank's lending performance to low-income borrowers. In New Orleans, Shreveport, and Lafayette, the percentage of low-income families living below the poverty level is 70.9%, 74.7% and 83.6%, respectively. In the Lincoln assessment area, the percentage of low-income families living below the poverty level is 95.5%. In addition, due to the substantial percentage of low-income families living below the poverty level, which significantly limits the bank's opportunities in regards to home mortgage lending to low-income families, more weight was given to the bank's borrower distribution to moderate-income families in arriving at overall conclusions.

The bank also provided us additional information for lending in the bank's assessment areas. The additional information involved the plotting or "geo-coding" of loans that did not have specific census tract information available by using zip code information. The accuracy of this additional information was not specifically tested, however the information was abstracted from the bank's HMDA LAR, which was found to be accurate during our data integrity examination. While the information allowed the bank to identify additional loans made within each

assessment area, geographic distribution between different census tract income levels was not available, as such we were able to only specifically analyze borrower distribution. Lincoln was the only assessment area that the additional loan information significantly impacted. Home purchase lending to low-income borrowers increased to 6.7%. Home improvement loans to low-income borrowers increased to 2.1% and moderate-income borrowers to 16.7%. Refinance lending to low-income borrowers increased to 4.6% and moderate-income borrowers to 7.2%. These new percentages are not reflected in the tables in Appendix C. The total number of additional loans geo-coded in the Lincoln assessment area equals 27, for a total of \$574,000.

Borrower distribution for home purchase loans is good in New Orleans and Shreveport, and adequate in Lafayette and Lincoln.

In New Orleans the market share of loans to low-income families for home purchase loans reflects excellent performance as the market share of loans to low-income families matches the bank's overall market share. Although the percentage of loans

made to low-income families is significantly below the percentage of low-income families in the area, the bank's performance is adequate considering the high percentage of low-income families living below the poverty level. The overall borrower distribution of home purchase loans to low-income borrowers in New Orleans is good. The percentage of loans made to moderate-income families is good with the percentage made being near the percentage of moderate-income families for the area. The market share for moderate-income families is also good in New Orleans as the percentage is near the overall market share for New Orleans. The bank's overall performance for borrower distribution of home purchase loans in New Orleans is good.

Although the percentage of home purchase loans made to low-income borrowers in Shreveport is significantly below the percentage of low-income families in the area, the bank's performance is adequate based on the significant percentage of families living below the poverty level. The bank's market share position for low-income borrowers is good as the market share percentage for low-income borrowers is near to the overall market share for home purchase loans in the Shreveport assessment area. With more weight given to the bank's loan distribution, the overall borrower distribution of home purchase loans to low-income borrowers in Shreveport is adequate. The percentage of home purchase loans made to moderate-income borrowers in the Shreveport assessment area is excellent as the percentage of loans made exceeds the percentage of moderate-

income families in the area. The market share of home purchase loans in Shreveport is also excellent with the percentage matching the bank's overall home purchase market share percent in the assessment area. The overall borrower distribution of home purchase loans to low- and moderate-income borrowers in Shreveport is good.

In Lafayette the percentage of home purchase loans made to low-income borrowers is adequate when taking into consideration the significant percentage of low-income families living below the poverty level. The bank's market share performance for home purchase loans to low-income borrowers is poor. The market share percentage for home purchase loans made to low-income borrowers is significantly below the bank's overall home purchase market share percentage in the Lafayette assessment area. With more weight given to the bank's percentage of loans made, the overall borrower distribution performance for home purchase loans to low-income borrowers is adequate. For moderate-income families in Lafayette, the bank's percentage of home purchase loans is adequate, and the percentage of loans made is close to the percentage of moderate-income families in the area. The market share position for the bank with respect to moderate-income families in Lafayette, is excellent as that percentage exceeds the bank's overall market share percentage for home purchase loans in the Lafayette assessment area. The overall borrower distribution performance for home purchase loans to

moderate-income borrowers is good. Combined, the overall borrower distribution for home purchase loans in Lafayette to low- and moderate-income borrowers is adequate since more weight was given to the bank's loan distribution performance.

The percentage of home purchase loans made to low-income borrowers in the Lincoln assessment area is adequate. Although the percentage of loans made to low-income borrowers is significantly below the percent of low-income families in the Lincoln assessment area, consideration was given to the substantially high level of families living below the poverty level. The bank's market share position for home purchase loans to low-income borrowers in Lincoln is excellent with the percentage exceeding the bank's overall market share position for home purchase loans in the Lincoln assessment area. The overall borrower distribution performance for home purchase to low-income borrowers in Lincoln is good. The bank's performance for home purchase lending to moderate-income borrowers in Lincoln is poor. The percentage of loans made to moderate-income borrowers is significantly below the percentage of moderate-income families in the Lincoln assessment area. The market share position for home purchase loans made to



moderate-income borrowers in Lincoln is also poor. The overall borrower distribution of home purchase loans to low- and moderate borrowers in Lincoln is adequate.

Borrower distribution performance for home improvement lending is good in New Orleans, Shreveport, and Lafayette. Taking into consideration the additional loans identified by the bank that were discussed above but are not reflected in the lending tables in Appendix C, the bank's home improvement lending performance is good in Lincoln.

Although, in New Orleans the percentage of loans to low-income borrowers is significantly below the percentage of low-income families in the area, taking into consideration the high percentage of families living below the poverty level, the bank's loan distribution is adequate. The bank's market share ratio to low-income borrowers in New Orleans is good, with the ratio being near to the bank's overall home improvement market share position in New Orleans. With more weight given to the bank's lending distribution, the overall borrower distribution for home improvement loans to low-income borrowers in New Orleans is adequate. For moderate-income borrowers, the bank's loan distribution is good in New Orleans. The percentage of loans made to moderate-income borrowers in New Orleans is near to the percentage of moderate-income families in the area. The bank's market share position with moderate-income borrowers is adequate in New Orleans. With more weight given to the bank's lending distribution, the overall borrower distribution of home improvement loans to moderate-income borrowers in New Orleans is good. Giving more weight to the bank's loan distribution performance

and taking into consideration the high percentage of low-income families living below the poverty level, the overall borrower distribution of home improvement loans to low- and moderate-income borrowers in New Orleans is good.

Borrower distribution for home improvement lending to low-income borrowers in Lafayette is adequate even with the percentage of loans made to low-income borrowers being significantly below the percentage of families in the area because of the high percentage of families living below the poverty level. The bank's market share ratio for low-income borrowers is good with the market share percentage near the bank's overall market share ratio in the Lafayette assessment area. With more weight given to the percentage of loans made to low-income borrowers, the bank's borrower distribution of home improvement loans to low-income borrowers in Lafayette is adequate. Home improvement lending to moderate-income borrowers in Lafayette is good with the ratio of loans made to

moderate-income borrowers near the percentage of moderate-income families in the area. The market share ratio for moderate-income borrowers is adequate, as the market share is less than the bank's overall market share. With more weight given to the bank's loan distribution performance, the overall borrower distribution of home improvement loans to moderate-income borrowers in Lafayette is good. Giving more weight to the bank's loan distribution performance and taking into consideration the high percentage of low-income families living below the poverty level, the overall borrower distribution of home improvement loans to low- and moderate-income borrowers in Lafayette is good.

Low-income borrower distribution for home improvement loans in Shreveport is adequate, while the market share ratio for low-income borrowers is excellent. The bank's overall home improvement loan distribution to low-income borrowers in Shreveport is good. In Shreveport, home improvement lending to moderate-income borrowers is good and the market share ratio for home improvement lending to moderate-income borrowers is excellent. The percentage of home improvement loans made to moderate-income borrowers is near the percentage of moderate-income families in the area. The bank's market share ratio of home improvement loans to moderate-income families substantially meets the bank's overall home improvement lending market share ratio. With more weight given to the bank's loan distribution performance, the overall borrower distribution of home improvement loans to moderate-income borrowers in Shreveport is good.

Taking into consideration the significant percentage of families living below the poverty level, home improvement lending to low-income borrowers in Lincoln is adequate. The bank's market share ratio to low-income borrowers reflects poor performance, with the bank's market share ratio significantly below the bank's overall home improvement market share position in the Lincoln assessment area.

With more weight given to the bank's borrower distribution, overall home improvement loan distribution to low-income borrowers in Lincoln is adequate. Considering the additional lending information on home improvement loans made to moderate-income borrowers in Lincoln, the bank's distribution of home improvement loans to moderate-income borrowers is excellent. The percentage of loans made to moderate-income persons exceeds the percentage of moderate-income families in the Lincoln assessment area. The bank's adjusted market share position is also excellent with the market share ratio for home improvement lending to moderate-income borrowers exceeding the bank's adjusted overall home improvement market share ratio in the Lincoln assessment area. Combined the bank's borrower distribution of home improvement loans to low- and moderate-income borrowers is good.

The distribution of home refinance loans to low- and moderate-income borrowers is adequate in New Orleans, Shreveport, and Lincoln and poor in Lafayette.

The refinancing loan distribution percent to low-income borrowers is adequate in all full-scope assessment areas of the bank. The percentage of refinancing loans made to low-income borrowers is significantly below the percentage of low-income families in New Orleans, Lafayette, Shreveport, and Lincoln assessment areas. However, considering the significant percentage of families living below the poverty level, the bank's distribution performance for refinancing loans to low-income borrowers is adequate. The bank's market share ratio for refinancing loans in low-income areas is inconsistent between the assessment areas. The bank's market share position for refinancing loans to low-income borrowers is adequate in New Orleans and Lafayette, good in Shreveport, and excellent in Lincoln. The market share ratio for refinancing loans to low-income borrowers is close to the bank's overall market share position for refinancing loans in both the New Orleans and Lafayette assessment areas. The market share position for refinancing loans to low-income borrowers is near the bank's overall market share position for refinancing loans in Shreveport. In Lincoln, the bank's market share position for refinancing loans to low-income borrowers exceeds the bank's overall market share ratio for refinancing loans. With more weight given to the bank's borrower distribution, the overall conclusion is that the bank's borrower distribution for refinancing loans to low-income borrowers is adequate in New Orleans, Lafayette, and Shreveport, and good in Lincoln.

The loan distribution percent for refinancing loans to moderate-income borrowers is adequate in New Orleans and Shreveport, and poor in Lafayette and Lincoln. The percentage of refinancing loans made to moderate-income borrowers is close to the percentage of moderate-income families in New Orleans and Shreveport and significantly below the percentage of moderate-income families in Lafayette and

Lincoln. The market share ratio of refinancing loans to moderate-income borrowers in New Orleans is good with the ratio being near to the bank's overall market share ratio for refinancing loans in the assessment area. In Shreveport the market share position for refinancing loans to moderate-income borrowers just exceeds the bank's overall market share and is considered excellent. Market share position for refinancing loans to moderate-income borrowers is adequate in Lafayette and poor in Lincoln. With more weight given to the bank's loan distribution performance, the overall conclusion is that the borrower distribution of refinancing loans to moderate-income people is adequate in New Orleans, and poor in Lafayette and Lincoln. Overall borrower distribution of refinancing loans to

moderate-income borrowers in Shreveport is good.

### **Small Business Loans**

No conclusion was developed for this aspect of the bank's lending performance. This situation is the result of the data integrity issue noted earlier, and the fact that revenue information was not available for 9% of the bank's reported small loans to businesses. We did note that a high percentage of the bank's small business loans were in amounts of \$100,000 or less. However, loan size is not considered a reliable indicator of the extent that the bank's small loans to businesses were made to small businesses.

### **Community Development Lending**

As noted above considering volume, innovativeness and complexity community development lending is adequate.

The volume of community development loans is adequate in the Lafayette assessment area and poor in Shreveport and New Orleans. There were no community development loans made in the Lincoln assessment area.

The volume of community development loans in the New Orleans assessment area is poor. Community development loans represent 0.5% of Tier 1 capital allocated to this assessment area. The bank made two community development loans during the evaluation period. One was for the retention of affordable housing and rehabilitated 81 affordable rental housing units. The second loan was part of a larger project to revitalize a blighted neighborhood.

In the Lafayette assessment area community development loans represent 2.4% of Tier 1 capital. Two loans were made, and both loans were for the creation of affordable housing. The loans created 40 new affordable rental units.

Shreveport community development loan volume is nominal at 0.4% of Tier 1 capital. One loan to create 35 affordable rental units was made during the evaluation period.

Below are details of two projects financed by BOLA and/or its affiliated companies.

**Brookhaven Apartments** (Shreveport assessment area): Loan funds were used for the permanent financing of a 35 unit low- and moderate-income housing complex

for individuals with a mentally ill family member in Shreveport. The project was so successful that the State of Louisiana has hired a consultant to perform this development function throughout the state. The development included the use of low-income housing tax credits and HOME funds. There is a need for decent affordable housing in the market due to the condition of the current housing stock. This project was moderately complex due to the multiple funding sources. The project is also considered to be innovative as it was the first housing project of its kind in the market.

**Sweetbridge Apartments** (Lafayette assessment area): The loan provided permanent financing for 40 apartment units for low-income individuals. As of the date of development, the occupancy rate was 96% for this type of unit with low turnover. All public housing units are occupied and there is a six-month waiting list. The housing units are expected to be absorbed within 180 days of completion. The project was developed using tax credits and below market financing rates. The bank also provided the construction loan. Secondary financing was provided from HOME affordable housing program funds.

### **Product Innovation and Flexibility**

The bank is making an adequate effort to provide flexible lending products to customers. BOLA has a customary array of flexible products for consumer mortgage and commercial clients.

Bank One has implemented a number of programs to increase access to home purchase loans. These programs increase access for low- and moderate-income borrowers also. Examples include:

- Applications accepted over the telephone in several languages,
- An automated service that provides around the clock mortgage loan pre-qualification, and
- A rate monitoring service available through the Internet where the mortgage company monitors rates and then notifies applicants when the desired rate is available.

The mortgage company has participated with government agencies in the design, development, and testing of affordable home loan products and offers several different affordable home loan products.

### **Lending Inside Versus Outside of the Assessment Areas**

BOLA has an excellent record of lending within its assessment areas. During the evaluation period 82.7% of the number and 84.5% of the dollar amount of the bank's home mortgage and small business lending was within its assessment areas. This analysis is performed only on loans made directly by the bank and does not include affiliate lending.

During the evaluation period 77.7% of home purchase loans were made within the bank's assessment areas, while 80.9% of the dollar amount were made within the assessment area. For refinance lending, 78% of the number and 79.4% of the dollar amount were made within the assessment area. For home improvement loans, 79.8% of the number and 82.9% of the dollar amount were made within the assessment area. For small loans to businesses, 90.1% of the number and 87.8% of the dollar amount were made within the assessment area.

### **Conclusions for Areas Receiving Limited Scope Reviews**

Lending Test performance in Alexandria, Baton Rouge, Houma, Lake Charles, Monroe, and the combined non-metropolitan areas is not inconsistent with the bank's Lending Test performance detailed above for the full-scope assessment areas.

## **INVESTMENT TEST**

Refer to Table 12 in Appendix C for the facts and data used to support these conclusions.

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

BOLA's performance under the Investment Test is good. The volume of investments is good in relation to the bank's capitalization and the community development opportunities available in the assessment areas. The bank's responsiveness to the most pressing needs of the community is excellent. In the Lincoln assessment area the bank's performance is excellent. In the New Orleans and Lafayette assessment areas, performance is good, while in the Shreveport assessment area, performance is adequate.

### **Dollar Amount of Qualified Investments**

BOLA's overall volume of investments is good. The volume of investments is excellent in Lincoln, good in Lafayette and New Orleans, and adequate in Shreveport. To assist in evaluating the volume of investments in each assessment

area, Tier 1 capital was allocated among the assessment areas based on the percentage distribution of deposits in each assessment area of the state.

In the Lincoln assessment area, the volume of qualified investments is excellent and represents 6% of Tier 1 capital with 96% of the investments from the current evaluation period. In the Lafayette assessment area, the volume is good and represents 7.5% of Tier 1 capital; however, only 19% of qualified investments are from the current period. In the New Orleans assessment area, the volume of qualified investments is also good and represents 3.9% of Tier 1 capital. In the Shreveport assessment area, the volume is adequate and represents 2.7% of Tier 1 capital. In both the New Orleans and Shreveport assessment areas, 49% of qualified investments are from the current evaluation period.

### **Innovativeness or Complexity of Qualified Investments**

Investments with complex characteristics were noted in each full-scope assessment area. In the New Orleans assessment area, 61% of the investments are complex and one investment is considered to be innovative. The innovative project is a single room occupancy project that was the first development of its type in Orleans Parish. The project houses “homeless” recovering alcoholics and involves counseling and job training for residents. The bank is the sole limited partner in the project and provided technical assistance to the developer, who was not experienced in affordable housing development.

In the Lincoln assessment area, the complexity of investments is adequate with one moderately complex development that makes up two investments. In both the Lafayette and Shreveport assessment areas, there is one complex investment. These investments are considered complex due to the multiple funding sources used and/or the inexperience of the community development organization involved that relied heavily on BOLA and affiliates to provide expertise needed to complete the funding applications or packages for the projects.

### **Responsiveness of Qualified Investments to Credit and Community Development Needs**

BOLA displays an excellent responsiveness to the most pressing need of affordable housing in the Lafayette, Lincoln, and New Orleans assessment areas and a good level of responsiveness in the Shreveport assessment area. In the New Orleans assessment area, the bank displays an excellent responsiveness to the need of affordable housing as 90% of investments are for the creation, retention and/or

support of affordable housing. In the New Orleans assessment area, 728 affordable housing units were created or renovated as a result of these investments. In the Lafayette and Lincoln assessment areas, BOLA displays an excellent responsiveness to the most pressing need of affordable housing with 97% and 96% of investments for affordable housing. The volume of housing units created and/or retained is 166 and 32 units, respectively. In the Shreveport assessment area, the bank displays a good responsiveness to the need of affordable housing with 78% of investments for the creation, retention, or support of affordable housing. These investments created or retained 88 affordable housing units.

Below are details of two investments by BOLA and/or its affiliated companies.

Holly Park Apartments Limited Partnership: This project consists of the rehabilitation of 81 apartment units in a moderate-income census tract in the New Orleans assessment area. The bank financed the construction for this project, as well as providing the equity investment. This is a section 8 property that had 16 units unsuitable for occupancy at the time of rehab. HUD had the property in foreclosure and asked a developer to take over ownership and property management. The involvement of HUD and the fact that this is a section 8 property increased the complexity of this project. Due to the poor condition of the apartment complex it was difficult to adequately determine the cost of the rehab, and the bank had to be very flexible in setting the level of reserves for the project.

Sensley Apartments: The project is located in a designated enterprise zone within Union Parish in the Lincoln assessment area. This is a tax credit project that uses HOME and state funding as well as low-income housing tax credits. BOLA provided the equity investment and bank staff provided the technical assistance necessary to sponsor the AHP grant application to the FHLB. Thirty-two rental units will be created for individuals at or below 60% AMI. Additional units will be set aside for elderly and handicapped individuals. This is the first development of new affordable housing units in the Lincoln area in several years. The project is considered complex due to the equity investment provided by the bank and the efforts put forth to sponsor and obtain the FHLB grant funds.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, BOLA's performance under the Investment Test in the non-metropolitan areas is inconsistent and stronger than the bank's overall performance under the investment test in Louisiana. Performance is stronger due



to the volume of qualified investments of 19.7% of Tier 1 capital allocated to the non-metropolitan assessment areas. Performance in the Baton Rouge, Houma, and Monroe assessment areas is consistent with the bank's overall performance. Performance in the Alexandria and Lake Charles assessment areas is inconsistent and weaker than the bank's overall performance in the state. However, it did not change the overall Investment Test rating for BOLA. Investments represent 1.24% and 1.15% of Tier 1 capital allocated to the Alexandria and Lake Charles assessment areas, respectively.

## **SERVICE TEST**

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

Overall Service Test performance for BOLA is adequate. Service Test performance is good in Shreveport, while performance in New Orleans, Lafayette and Lincoln is adequate.

### **Retail Bank Services**

Refer to Table 13 in Appendix C for the data used in this analysis.

### **Accessibility of Delivery Systems**

The accessibility of the bank's retail services is adequate in New Orleans, Lafayette, and Lincoln, and good in Shreveport.

In New Orleans, branch and ATM distribution is poor in low-income areas. The bank closed its only branch in a low-income area during the evaluation period and the percentage of ATMs located in low-income areas is below the percentage of the population living in low-income areas. Branch distribution is excellent in moderate-income areas, with the percentage of branches in these areas matching the percentage of population living in moderate-income areas. The ATM distribution in moderate-income areas is good with the percentage of ATMs being close to the percentage of population living in moderate-income areas of New Orleans. With more weight given to the distribution of branches, the overall accessibility to delivery systems in moderate-income areas of New Orleans is excellent. Combined, the accessibility to delivery systems in both low- and moderate-income areas is adequate. BOLA has 55 branches and 111 ATMs in the New Orleans assessment area, providing an extensive network to deliver banking services.

The accessibility of the bank's retail services is adequate in Lafayette with 20 branches and 29 ATMs. Branch distribution is poor in low-income areas as the bank closed its only branch located in a low-income census tract during the evaluation period. However, ATM distribution is excellent in low-income areas with the percentage of ATMs exceeding the percentage of the population in low-income census tracts. With more weight given to branch distribution, the overall accessibility to delivery systems in low-income areas of Lafayette is adequate. Branch distribution is adequate in moderate-income areas, with the percentage of branches being close to the percentage of the population in moderate-income census tracts. ATM distribution is poor in moderate-income areas, with the percentage of ATMs significantly below the percentage of population living in moderate-income areas. With more weight given to branch distribution for accessibility of services, the overall performance for moderate-income areas of Lafayette is adequate.

The bank has 10 branches and 11 ATMs serving the Lincoln assessment area. There are no low-income census tracts in the Lincoln assessment area. Branch distribution in moderate-income areas is poor with BOLA closing the only branch located in a moderate-income area during the evaluation period. ATM distribution in moderate-income areas of Lincoln is good, with the percentage of ATMs close to the population percentage of moderate-income areas. The overall performance for accessibility of services in Lincoln is adequate.

In low-income areas of Shreveport, the bank's branch and ATM distribution is excellent with the percentage of branches and ATMs exceeding the percentage of population in low-income areas. For moderate-income areas of Shreveport, the bank's branch distribution is adequate with the percentage of branches close to the percentage of the population of moderate-income areas. ATM distribution in moderate-income areas of Shreveport is also adequate as the percentage of ATMs is close to the percentage of the population in moderate-income census tracts. There are 27 branches and 30 ATMs located in the Shreveport assessment area, providing a good penetration in the market.

Access to BOLA's services can be achieved in a number of ways. BOLA has an active toll free telephone loan access system. A consumer can apply for a loan (home equity loan, home equity lines of credit, installment loan, and credit cards) over the telephone twenty-four hours a day, seven days a week, in English or Spanish. In 1998, 53% of all approved consumer loans originated through Loan by Phone, while 43% originated through the branch delivery channel. Through June 30, 1999 use of the Loan by Phone increased to 61% of all approved consumer loans, with 37% being originated through branch locations. Several of the bank's

services are accessible through the Internet. Internet services include on-line applications for checking, savings, and certificates of deposit. Loan applications

are also available for credit cards, home equity loans, home equity lines of credit, student loans, and mortgages. On-line applications are available for business installment, business credit cards, and business lines of credit for small businesses.

Customers may also transfer between BOLA accounts, pay bills, and get information on statements, investments, taxes, and insurance. BOLA reported over 25,000 on-line customers in 1999. Internet access is available to the general public through the public library system and some community organizations. Over 100 sites are located in the bank's assessment area that provide Internet access to patrons. Thirty-seven of those sites are located in low- and moderate-income areas.

Bank One at Work is a program that promotes, through employers, the direct deposit of paychecks and the availability of loans. This program was introduced to the Louisiana market in 1998 and was repositioned in 1999 to offer the same products as the banking centers. Marketing materials are now offered in Spanish.

Production for year to date June 30, 1999 includes 1,510 checking accounts, 421 savings accounts, and 639 credit card applications.

However, these services were not given significant consideration because it is unknown how effective they were in increasing access to banking services for low- and moderate-income individuals.

### **Changes in Branch Locations**

The changes made in branch locations for moderate-income areas of New Orleans and Lafayette is excellent. In New Orleans eight new branches were opened or acquired in moderate-income areas and four new branches were opened or acquired in Lafayette's moderate-income census tracts. These new branches have improved the accessibility of the bank's delivery systems in those areas. The bank's performance in low-income areas is adequate as the bank closed the only branch located in low-income areas of both New Orleans and Lafayette. The branch in New Orleans was closed after a corporate merger and both banks had a branch within 0.5 miles of each other. The branch that remained opened was significantly larger and had longer drive-up hours. It is noted that both branches were on the same public transportation bus line. The branch that was closed in Lafayette was located on a state university campus. The accounts were moved to a branch that was located less than one mile away. The closed branch did not

have a drive-up facility and had shorter banking hours. BOLA left an ATM at the closed branch site. The bank's performance in the Lincoln assessment area was also adequate since the only branch located in the moderate-income area was closed. This branch was also located on a state university campus. The accounts were again moved to a branch with longer business hours, and only one mile away from the closed branch. The bank placed an ATM on the university campus after the branch was closed. Performance in Shreveport was good. The accessibility of services was not adversely affected because no changes were made in branch location for either the low- or moderate-income areas of Shreveport.

During our examination we reviewed five of the bank's closed branch file reports. The reports provided details of the bank's analysis including the number of financial institutions located within a three-mile radius of the branch being considered for closure, and the distance to the closest BOLA office. In addition, the bank included any public comments received from the closing announcement and the bank's response to those comments. All closings were considered to be reasonable.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The reasonableness of business hours and services at branch locations is good in New Orleans, Lafayette, and Lincoln. Each branch office is a full-service banking center and the hours of operation are fairly consistent. In Shreveport services are good in low- and moderate-income areas with each banking center offering a full range of services. Hours of operation in Shreveport are adequate. In Shreveport, all of the branches located in low-income census tracts and 75% of branches located in moderate-income areas lack Saturday hours. This compared to 46% of branches located in middle-income census tracts and 43% of branches located in upper-income areas. The branches without Saturday hours are primarily located in more commercial/industrial or "downtown" areas that would have only minimal activity on weekends.

### **Community Development Services**

The level of community development services is good in New Orleans and adequate in the Shreveport, Lafayette, and Lincoln assessment areas.

### **Extent of Community Development Services Provided**

The level of community development services is good in the New Orleans assessment area. Twenty-seven employees are involved in community development organizations. Community development services were provided to 31 community development organizations. Sixteen employees hold leadership positions such as board or loan committee member within the organizations. Other employees provide counseling services for first-time or low- and moderate-income homebuyers, or technical assistance to not-for-profit housing developers. Employees also provided homebuyer counseling on nine occasions. Employees assisted not-for-profit groups in obtaining Federal Home Loan Bank grant monies and assisted organizations in applying for pending tax credit funds. The bank participated in a conference to pair community development organizations with financial institutions.

The level of community development services is adequate in the Lafayette assessment area. Eleven employees are involved in community development organizations. Community development services were provided to eleven organizations. Bank employees hold leadership positions, such as board or loan committee members, with ten of the organizations. Community development services include providing small business information at a state conference and financial information at a small business exposition. Services also addressed the need for affordable housing in the area.

The level of community development services is adequate in the Shreveport assessment area. Fifteen employees are involved in community development organizations. These employees provide community development services to twelve organizations. Seven employees hold leadership positions such as board or loan committee member. Services provided include homebuyer counseling and counseling a local group on the creation of a non-profit corporation for affordable housing businesses. Employees are also responsible for assisting a not-for-profit organization in preparing and submitting a tax credit funding application for a project that was not progressing without this assistance.

In the Lincoln assessment area, performance is adequate. Five employees provide community development services to five community development organizations. The majority of the services are directed towards affordable housing, including homebuyer training and assistance to a local organization in obtaining a FHLB grant.

### **Innovativeness and Responsiveness of Community Development Services Provided**

BOLA's responsiveness to identified credit needs through community development

services is adequate in the Lincoln, Lafayette, and Shreveport assessment areas and good in the New Orleans assessment area. The bank's services respond to affordable housing and economic development needs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Performance in Baton Rouge, Houma, Lake Charles, Monroe, and the combined non-metropolitan areas was inconsistent and better with regards to accessibility of delivery systems. Branch and ATM distribution in these assessment areas was good or excellent since the distribution was close to or exceeded the population distribution in low- and moderate-income areas. Performance in Alexandria was not inconsistent with the bank's overall performance.

## 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 areas that received comprehensive examination review (designated by the term AFull-Scope ≡).

<b>Time Period Reviewed</b>	Lending Test: January 1, 1997 to June 30, 1999 Investment Test: December 14, 1996 to June 30, 1999 Service Test: December 14, 1996 to June 30, 1999	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Bank One Louisiana, NA (BOLA) Baton Rouge, Louisiana	Home purchase and refinance mortgage loans, home improvement loans, small business loans, community development loans, community development investments, retail and community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Banc One Community Development Corporation	Holding Company Subsidiary	Community development related loans and equity investments.
First Chicago Leasing Corporation	Subsidiary of Affiliate - First Chicago National Bank	Community development related equity investments.
Banc One Mortgage Company	Holding Company Subsidiary	Home purchase and refinance loans.
Banc One Financial Services	Holding Company Subsidiary	Home improvement, mortgage, and refinance loans.
Banc One Capital Funding Corporation	Holding Company Subsidiary	Community development related loans and services.
Bank One Oklahoma	Holding Company Subsidiary	Community development related equity investments.
Bank One Michigan	Holding Company Subsidiary	Community development related equity investments.
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Lafayette MSA Lincoln non- MSA New Orleans MSA Shreveport MSA Alexandria MSA Baton Rouge MSA Houma MSA Lake Charles MSA Monroe MSA Non-metro AAs	Full-Scope Full-Scope Full-Scope Full-Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope	Added November 1998 as result of merger.

# Appendix B: Market Profiles for Full-Scope Areas

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

Lafayette MSA .....	B - 2
Lincoln non-MSA .....	B - 3
New Orleans MSA .....	B - 4
Shreveport MSA .....	B - 5



## A. Lafayette MSA

Demographic Information for Full-Scope Area: MSA 3880 Lafayette, LA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	53	7.55	15.09	35.85	41.51	0.00
Population by Geography	220,644	4.76	18.12	33.93	43.19	0.00
Owner-Occupied Housing by Geography	50,783	3.70	16.73	35.22	44.35	0.00
Businesses by Geography	11,207	3.51	13.68	32.07	50.74	0.00
Farms by Geography	xxx	x.xx	xx.xx	xx.xx	xx.xx	0.00
Family Distribution by Income Level	57,365	22.75	13.79	16.66	46.80	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	20,961	7.92	27.76	38.39	25.93	0.00
Median Family Income	= \$24,153	Median Housing Value		= \$50,234		
HUD Adjusted Median Family Income for 1998	= \$34,400	Unemployment Rate xxxx xx, 1999		= 5.6%		
Households Below the Poverty Level	= 26.38%					

Source: 1990 U.S. Census and 1998 HUD updated MFI.

The Lafayette MSA consists of Acadia, Lafayette, St. Landry and St. Martin Parishes and is located in the South Central part of Louisiana. The bank's assessment area consists of Acadia and Lafayette Parishes. During the evaluation period, St. Landry Parish was added due to the First Commerce merger. The review was performed using the pre-merger assessment area.

In terms of deposit market share, BOLA is the largest bank in the assessment area with 38.6% of bank deposits according to the June 30, 1998, FDIC Market Share Reports. The second largest bank had a market share percentage of 8.4%.

Community credit needs were assessed by reviewing information collected from other contacts of community-based organizations in the last 24 months. No specific credit needs were identified by community contacts. Overall, the comments received have been positive about the manner in which BOLA and other banks have provided needed credit, investments, and services in the communities.

We concluded that there is a significant need for both single-family and multi-family affordable housing within the MSA. The high level of blighted properties in the state increases this need. Community development opportunities exist within the assessment area. BOLA continues to work closely with several community development organizations to expand their capacity that will further increase

development opportunities in the area.

### Lincoln Non-MSA

Demographic Information for Full-Scope Area: Claiborne, Lincoln, Morehouse and Union Parishes						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	29	NA	20.69	44.83	34.48	0.00
Population by Geography	111,778	NA	23.18	40.90	35.92	0.00
Owner-Occupied Housing by Geography	27,348	NA	18.14	44.89	36.97	0.00
Businesses by Geography	3,335	NA	18.20	43.15	38.65	0.00
Farms by Geography	xxx	x.xx	xx.xx	xx.xx	xx.xx	0.00
Family Distribution by Income Level	27,792	23.33	15.18	15.77	45.72	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	10,703	NA	28.75	47.16	24.09	0.00
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$21,178 = \$29,500 = 28.71%	Median Housing Value Unemployment Rate xxxx xx, 1999		= \$41,676 = 5.9%		

Source: 1990 U.S. Census and 1998 HUD updated MFI, and LOUISIANA Department of Commerce.

This assessment area is comprised of Claiborne, Lincoln, Morehouse and Union Parishes and is located in the northeastern portion of the state. No changes were made to the assessment area during the evaluation period.

According to the June 30, 1998, FDIC Market Share Reports, BOLA was the largest bank in the assessment area, with a market share of 33.3%. The next largest bank held a deposit market share of 22.3%.

Credit needs identified by community contacts included financing for new housing developments and loans for consumer and business purposes. While community development needs are apparent in the assessment area, opportunities have not been readily available.

## New Orleans MSA

Demographic Information for Full-Scope Area: MSA 5560 New Orleans, LA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	350	18.00	20.86	30.29	27.71	3.14
Population by Geography	1,156,383	12.57	20.96	34.66	31.81	0.00
Owner-Occupied Housing by Geography	242,716	5.07	16.50	39.47	38.96	0.00
Businesses by Geography	46,942	9.78	21.45	32.71	36.05	0.00
Farms by Geography	xxx	x.xx	xx.xx	xx.xx	xx.xx	0.00
Family Distribution by Income Level	296,686	25.12	15.58	18.75	40.55	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	120,756	22.49	29.09	32.63	15.79	0.00
Median Family Income	= \$29,212	Median Housing Value		= \$69,223		
HUD Adjusted Median Family Income for 1998	= \$40,400	Unemployment Rate xxxx xx, 1999		= 5.7%		
Households Below the Poverty Level	= 20.14%					

Source: 1990 U.S. Census and 1998 HUD updated MFI, and LOUISIANA Department of Commerce.

The New Orleans MSA is the largest MSA within the state of Louisiana and consists of Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. James, St. John the Baptist and St. Tammany Parishes. The bank's assessment area consists of Jefferson, Orleans, St. Bernard and St. Tammany Parishes. St. Charles and St. John the Baptist Parishes were added in November 1998 due to the First Commerce merger. The evaluation was performed using the pre-merger assessment area.

In terms of deposit market share, BOLA is the largest bank in the MSA, with 33.3% of bank deposits in the assessment area according to the June 30, 1998, FDIC Market Share Report. The second largest bank has a market share of 22.3%.

Community credit needs within the New Orleans assessment area were obtained from community contacts with community-based organizations during the last 24 months.

We concluded that there is a significant need for the renovation and new construction of affordable housing units within the assessment area. The need is due to the high level of units that do not meet local housing codes and blighted areas. There is also a need for credit education and investments in certified housing counseling agencies. Several groups mentioned the need for more flexible

products and underwriting standards for low- and moderate-income borrowers, including the ability to distinguish between types of credit problems and the acceptance of undocumented income from the tourism industry. There is also a need for revitalization and stabilization of certain neighborhoods. Loans to small businesses and mezzanine capital were also identified as credit needs within the assessment area. Community development needs and opportunities exist in the New Orleans assessment area.

## Shreveport MSA

Demographic Information for Full-Scope Area: MSA 7680 Shreveport/Bossier City, LA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts)	82	14.63	23.17	29.27	25.61	7.32
Population by Geography	334,341	7.51	24.20	38.44	29.85	0.00
Owner-Occupied Housing by Geography	80,544	5.07	22.03	38.44	34.46	0.00
Businesses by Geography	12,309	14.70	19.12	41.29	24.87	0.02
Farms by Geography	xxx	x.xx	xx.xx	xx.xx	xx.xx	0.00
Family Distribution by Income Level	89,057	23.29	15.45	19.36	41.90	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	34,508	13.57	34.12	37.36	14.95	0.00
Median Family Income	= \$27,402	Median Housing Value		= \$54,386		
HUD Adjusted Median Family Income for 1998	= \$37,900	Unemployment Rate xxxx xx, 1999		= 6.4%		
Households Below the Poverty Level	= 20.86%					

Source: 1990 U.S. Census and 1998 HUD updated MFI, and LOUISIANA Department of Commerce.

The Shreveport/Bossier City MSA consists of Bossier, Caddo and Webster Parishes. The bank's assessment area consists of Bossier and Caddo Parishes. There were no changes made to the assessment area during the evaluation period.

In terms of deposit market share, BOLA is the largest bank in the assessment area with 30.5% of bank deposits according to the June 30, 1998, FDIC Market Share Report. The second largest bank held a 27.3% deposit market share position.

Community credit needs were determined by reviewing contacts with community based organizations over the last 24 months. There is a need for more employment opportunities. In addition, the need for affordable housing exists throughout the state. Community development needs are apparent in the assessment area and

community development opportunities are increasing. It is noted that BOLA is working closely with several community development organizations to increase their capacity and that in turn has increased community development opportunities in the Shreveport assessment area.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

The tables cover the entire CRA evaluation period. References to the Abank 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; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated 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 HMDA Home Improvement Loan Originations** - See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations** - See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (< \$1 million) to businesses originated 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.

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- Table 6. Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (< \$500,000) to farms originated 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 HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated 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 rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations** - See Table 7.
- Table 9. Borrower Distribution of HMDA Refinance Loan Originations** - See Table 7.
- Table 10. Borrower Distribution of Small Business Loan Originations** - Compares the percentage distribution of the number of small loans (< \$1 million) originated 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 presents the percentage distribution of the number of loans originated 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 Farm Loan Originations** - Compares the percentage distribution of the number of small loans (< \$500 thousand) originated 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 presents the percentage distribution of the number of loans originated 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/assessment area.

**Table 13. Distribution of Branch and ATM Delivery System** - Compares the percentage distribution of the number of the bank=s retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

Table 1. Lending Volume

LENDING VOLUME		State: LOUISIANA						Evaluation Period: JANUARY 1, 1997 TO JUNE 30, 1999				
MSA /Assessment Area	% of Total bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farms		Community Development		Total Reported Loans		% of Total reported Bank Loans in Rated Area
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Scope:												
Lafayette	10.2%	1,570	74,908	1,193	120,572	8	721	2	1,835	2,773	198,035	8.7%
Lincoln	2.6%	119	6,948	634	56,723	23	2,168	0	0	776	65,839	2.4%
New Orleans	41.6%	6,279	390,463	1,827	178,041	5	308	2	1,675	8,113	570,487	25.5%
Shreveport	7.7%	2,527	109,604	2,110	238,425	52	5,818	1	236	4,690	354,083	14.7%
Limited Scope:												
Alexandria*	4.0%	168	6,822	83	6,038	11	1,158	0	0	262	14,018	.8%
Baton Rouge	15.4%	4,482	254,437	1,604	148,992	0	0	13	6,073	6,099	409,502	19.1%
Houma	3.9%	1,924	71,049	603	53,626	1	50	0	0	2,528	124,725	7.9%
Lake Charles	5.6%	1,756	73,653	795	60,567	15	1,286	1	769	2,567	136,275	8.1%
Monroe	7.0%	1,570	68,955	1,073	79,883	35	4,454	2	3,745	2,680	157,037	8.4%
Non-metro	2.0%	694	32,298	651	41,087	48	5,599	3	447	1,396	79,431	4.4%

(\*) Based on 1999 Bank One, Louisiana, NA HMDA, CRA and other bank data. Alexandria became a Bank One assessment area in November 1998

**Table 2. Geographic Distribution of Home Purchase Loan Originations**

Geographic Distribution: HOME PURCHASE										State: LOUISIANA					Evaluation Period: JANUARY 1, 1997 TO JUNE 30, 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	Upper	#	% of Total	
Full Scope:																	
Lafayette	3.7	2.2	16.7	6.0	35.2	22.8	44.4	69.1	13	2.4	6.1	1.4	2.4	2.4	233	7.3	
Lincoln	NA	NA	18.1	14.6	44.9	36.6	37.0	48.8	11	2.8	NA	3.8	2.2	3.2	41	1.3	
New Orleans	5.1	4.3	16.5	8.1	39.5	35.8	39.0	50.9	6	3.3	4.1	1.9	2.9	3.9	1,060	33.2	
Shreveport	5.1	0.7	22.0	18.4	38.4	31.8	34.5	49.1	19	1.3	1.6	2.6	.7	1.7	283	8.9	
Limited Scope:																	
Alexandria (**)	5.2	0.0	21.1	0.0	45.9	55.6	27.7	44.4	NA	NA	NA	NA	NA	NA	9	0.3	
Baton Rouge	8.8	3.2	16.5	13.8	27.8	30.4	47.0	52.6	7	3.9	3.9	6.3	3.3	3.9	835	26.1	
Houma	NA	NA	9.1	6.3	75.9	74.7	15.0	19.0	11	2.3	NA	4.8	2.5	1.3	174	5.4	
Lake Charles	4.8	1.8	14.2	15.7	52.2	45.2	28.8	37.3	10	3.4	4.3	5.7	3.1	3.2	217	6.8	
Monroe	12.6	4.5	17.1	17.2	39.5	41.6	30.8	36.7	8	4.1	4.4	6.1	3.8	3.9	221	6.9	
Non-metro	NA	NA	14.3	10.5	61.0	43.6	24.7	46.0	17	1.7	NA	2.1	1.0	2.8	124	3.9	

(\*) Based on 1998 Aggregate HMDA Data only.

(\*\*) Based on 1999 Bank One, Louisiana, NA HMDA data. Alexandria became a Bank One assessment area in November 1998.

**Table 3. Geographic Distribution of Home Improvement Loan Originations**

Geographic Distribution: HOME IMPROVEMENT										State: LOUISIANA					Evaluation Period: JANUARY 1, 1997 TO JUNE 30, 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	Upper	#	% of Total			
Full Scope:																			
Lafayette	3.7	4.9	16.7	4.9	35.2	27.5	44.4	62.8	2	12.1	24.0	4.1	9.1	16.3	408	8.4			
Lincoln	NA	NA	18.1	20.8	44.9	33.3	37.0	45.8	4	9.0	NA	10.2	6.6	11.5	24	0.5			
New Orleans	5.1	3.5	16.5	11.5	39.5	38.5	39.0	46.5	2	19.5	11.5	15.1	18.5	23.1	1,697	34.8			
Shreveport	5.1	3.4	22.0	19.6	38.4	39.1	34.5	37.9	2	11.8	12.0	11.8	11.0	12.6	644	13.2			
Limited Scope:																			
Alexandria (**)	5.2	0.0	21.1	9.7	45.9	54.8	27.7	35.5	NA	NA	NA	NA	NA	NA	31	0.6			
Baton Rouge	8.8	6.6	16.5	10.6	27.8	25.2	47.0	57.7	3	13.6	11.8	10.4	12.9	15.2	640	13.1			
Houma	NA	NA	9.1	4.9	75.9	79.7	15.0	15.4	3	11.3	NA	7.6	12.4	8.6	428	8.8			
Lake Charles	4.8	6.8	14.2	14.2	52.2	49.4	28.8	29.6	2	17.7	23.9	22.5	17.3	16.2	443	9.1			
Monroe	12.6	11.8	17.1	14.8	39.5	34.6	30.8	38.9	1	29.3	41.2	42.3	24.0	27.1	399	8.2			
Non-metro	NA	NA	14.3	10.2	61.0	36.2	24.7	53.6	8	5.6	NA	7.3	3.5	8.6	166	3.4			

(\*) Based on 1998 Aggregate HMDA Data only.

(\*\*) Based on 1999 Bank One, Louisiana, NA HMDA data. Alexandria became a Bank One assessment area in November 1998.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations**

Geographic Distribution: HOME MORTGAGE REFINANCE										State: LOUISIANA					Evaluation Period: JANUARY 1, 1997 TO JUNE 30, 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	Mid	Upper	#	% of Total			
Full Scope:																			
Lafayette	3.7	2.6	16.7	5.1	35.2	21.5	44.4	70.8	1	8.5	13.2	4.4	6.0	10.2	929	7.1			
Lincoln	NA	NA	18.1	11.1	44.9	25.9	37.0	63.0	8	3.4	NA	3.3	1.9	4.7	54	0.4			
New Orleans	5.1	2.7	16.5	9.4	39.5	36.8	39.0	51.2	2	6.4	4.0	4.7	6.2	7.1	3,522	27.1			
Shreveport	5.1	2.2	22.0	13.6	38.4	38.1	34.5	46.1	2	9.7	5.7	11.7	9.4	9.5	1,600	12.3			
Limited Scope:																			
Alexandria **	5.2	0.0	21.1	11.7	45.9	47.7	27.7	40.6	NA	NA	NA	NA	NA	NA	128	1.0			
Baton Rouge	8.8	3.4	16.5	8.1	27.8	25.9	47.0	62.6	2	11.7	7.5	8.4	11.3	12.7	3,007	23.1			
Houma	NA	NA	9.1	5.6	75.3	73.8	15.0	20.7	2	13.4	NA	10.9	14.0	12.2	1,322	10.2			
Lake Charles	4.8	3.1	14.2	8.9	52.2	46.4	28.8	41.7	2	13.0	12.3	10.9	12.8	13.7	1,096	8.4			
Monroe	12.6	6.2	17.1	9.5	39.5	36.1	30.8	48.2	1	11.6	11.6	12.1	10.7	12.3	950	7.3			
Non-metro	NA	NA	14.3	10.4	61.0	41.6	24.7	48.0	5	4.4	NA	3.0	3.9	6.0	404	3.1			

(\*) Based on 1998 Aggregate HMDA Data only.

(\*\*) Based on 1999 Bank One, Louisiana, NA HMDA data. Alexandria became a Bank One assessment area in November 1998.

**Table 5. Geographic Distribution of Small Business Loan Originations**

Geographic Distribution: SMALL BUSINESS		State: LOUISIANA								Evaluation Period: JANUARY 1, 1997 TO JUNE 30, 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	Upper	#	% of Total
Full Scope:																
Lafayette	3.5	1.8	13.7	5.0	32.1	30.3	50.7	63.0	1	19.0	12.0	8.3	17.2	18.0	1,193	11.3
Lincoln	NA	NA	18.2	12.2	43.2	40.2	38.7	47.6	2	30.4	NA	22.5	12.0	32.8	634	6.0
New Orleans	9.8	8.1	21.5	19.7	32.7	29.9	36.1	42.3	6	6.1	6.2	6.1	4.7	5.6	1,827	17.3
Shreveport	14.7	16.3	19.1	19.2	41.3	35.0	24.9	29.6	1	24.5	22.1	26.0	21.1	20.6	2,110	20.0
Limited Scope:																
Alexandria**	11.6	7.2	20.8	27.7	38.6	27.7	25.8	37.4	NA	NA	NA	NA	NA	NA	83	0.8
Baton Rouge	11.7	9.0	13.4	13.1	31.8	28.1	43.1	49.8	3	12.8	16.9	13.0	11.0	11.3	1,604	15.2
Houma	NA	NA	10.5	15.9	74.3	65.0	15.2	10.1	3	13.3	NA	18.7	11.0	7.0	603	5.7
Lake Charles	4.6	1.6	22.4	17.9	50.0	45.5	23.1	35.0	2	20.7	10.9	16.6	17.5	21.8	795	7.5
Monroe	25.1	21.9	15.7	14.0	31.9	24.9	27.3	39.2	2	20.6	21.3	25.1	12.4	18.7	1,073	10.2
Non-metro	NA	NA	18.5	21.8	54.5	43.5	27.0	34.7	2	12.8	NA	13.4	7.6	8.1	651	6.2

(\*) Based on 1998 Aggregate Small Business Data only.

**Table 6. Geographic Distribution of Small Farm Loan Originations -**

Geographic Distribution: SMALL FARM		State: LOUISIANA								Evaluation Period: JANUARY 1, 1997 TO JUNE 30, 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 Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upper	#	% of Total
Full Scope:																
Lafayette	1.2	0.0	16.7	12.5	45.8	25.0	36.3	62.5	2	15.2	0.0	11.1	7.1	30.	8	4.3
Lincoln	NA	NA	9.8	4.3	63.6	69.6	26.7	26.1	4	6.0	NA	3.8	5.2	13.6	23	12.3
New Orleans	3.7	0.0	16.9	20.0	45.1	20.0	34.2	60.0	5	8.3	0.0	20.0	0.0	15.4	5	2.7
Shreveport	3.4	0.0	12.3	19.2	50.7	59.6	33.2	21.2	2	35.3	0.0	40.0	49.0	18.8	52	27.8
Limited Scope:																
Alexandria																
Baton Rouge	8.1	0.0	6.7	0.0	25.6	0.0	59.6	0.0	0	0.0	0.0	0.0	0.0	0.0	0	0.0
Houma	NA	NA	11.4	0.0	66.9	100.0	20.0	0.0	0	0.0	0.0	0.0	0.0	0.0	1	0.5
Lake Charles	0.0	0.0	15.2	6.7	57.3	73.3	27.5	20.0	2	6.3	0.0	0.0	5.6	18.2	15	8.0
Monroe	6.8	0.0	11.3	2.9	48.1	34.3	33.8	62.9	3	22.9	0.0	33.3	18.5	27.1	35	18.7
Non-metro	NA	NA	8.0	0.0	81.1	47.9	10.8	52.1	2	8.6	0.0	0.0	4.1	52.2	48	25.7

(\*) Based on 1998 Aggregate Small Farm Data only.



**Table 7. Borrower Distribution of Home Purchase Loan Originations**

Borrower Distribution: HOME PURCHASE		State: LOUISIANA								Evaluation Period: JANUARY 1, 1997 TO JUNE 30, 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	Upper	#	% of Total
Full Scope:																
Lafayette	22.8	2.6	13.8	9.9	16.7	27.0	46.8	56.7	13	2.4	1.1	2.8	3.3	2.3	233	7.3
Lincoln	23.3	4.9	15.2	7.3	15.8	12.2	45.7	65.9	11	2.8	3.2	1.6	1.8	3.9	41	1.3
New Orleans	25.1	4.9	15.6	13.5	18.8	19.8	40.6	55.5	6	3.3	3.3	3.0	3.8	4.8	1,060	33.2
Shreveport	23.3	3.5	15.5	17.3	19.4	18.4	41.9	51.6	19	1.3	1.0	1.3	.8	2.0	283	8.9
Limited Scope:																
Alexandria***	24.0	11.1	16.5	11.1	18.9	0.0	40.6	77.8	NA	NA	NA	NA	NA	NA	9	0.3
Baton Rouge	23.4	11.5	14.6	24.7	18.7	18.3	43.3	39.6	7	3.9	6.3	4.8	3.0	4.6	835	26.1
Houma	24.1	4.6	15.3	10.3	19.7	25.3	40.9	56.9	11	2.3	3.1	1.0	2.1	3.0	174	5.4
Lake Charles	23.8	7.4	16.3	17.1	19.3	24.9	40.7	44.7	10	3.4	3.2	4.0	3.6	3.0	217	6.8
Monroe	24.9	5.9	16.0	12.2	17.6	17.7	41.5	60.5	8	4.1	8.4	3.8	4.9	4.9	221	6.9
Non-metro	23.9	0.8	15.5	8.1	16.7	16.9	43.9	72.6	17	1.7	0.0	1.4	1.2	2.2	124	3.9

(\*) As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated by BANK ONE LOUISIANA, N.A.

(\*\*) Based on 1998 Aggregate HMDA Data only.

(\*\*\*) Based on 1999 Bank One, Louisiana, NA HMDA data. Alexandria became a Bank One assessment area in November 1998.

**Table 8. Borrower Distribution of Home Improvement Loan Originations**

Borrower Distribution: HOME IMPROVEMENT		State: LOUISIANA								Evaluation Period: JANUARY 1, 1997 TO JUNE 30, 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	Upper	#	% of Total
Full Scope:																
Lafayette	22.8	7.4	13.8	11.3	16.7	17.9	46.8	60.5	2	12.1	9.4	7.9	12.9	13.2	408	8.4
Lincoln	23.3	0.0	15.2	8.3	15.8	16.7	45.7	54.2	4	9.0	0.0	5.4	12.5	9.0	24	0.5
New Orleans	25.1	7.0	15.6	12.2	18.8	21.5	40.6	54.4	2	19.5	17.3	15.9	19.7	22.6	1,697	34.8
Shreveport	23.3	10.3	15.5	13.8	19.4	21.9	41.9	52.5	2	11.8	12.8	11.5	9.7	12.8	644	13.2
Limited Scope:																
Alexandria ***	24.0	9.7	16.5	32.3	18.9	19.4	40.6	38.7	NA	NA	NA	NA	NA	NA	31	0.6
Baton Rouge	23.4	6.1	14.6	11.9	18.7	20.5	43.3	59.5	3	13.6	9.5	10.3	13.6	16.8	640	13.1
Houma	24.1	6.3	15.3	14.0	19.7	21.7	40.9	56.8	3	11.3	10.3	17.5	12.3	11.2	428	8.8
Lake Charles	23.8	9.0	16.3	19.0	19.3	25.1	40.7	44.7	2	17.7	23.0	21.2	16.8	18.1	443	9.1
Monroe	24.9	6.3	16.0	13.5	17.6	19.6	41.5	57.9	1	29.3	24.5	33.7	31.3	27.0	399	8.2
Non-metro	23.9	2.4	15.5	11.5	16.7	16.9	43.9	65.1	8	5.6	5.1	8.1	3.1	5.6	166	3.4

(\* ) As a percentage of loans with borrower income information available. No information was available for x% of loans originated by Bank One, Louisiana, NA

(\*\* ) Based on 1998 Aggregate HMDA Data only.

(\*\*\* ) Based on 1999 Bank One, Louisiana, NA HMDA data. Alexandria became a Bank One assessment area in November 1998.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations**

Borrower Distribution: HOME MORTGAGE REFINANCE				State: LOUISIANA				Evaluation Period: JANUARY 1, 1997 TO JUNE 30, 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 Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upper	#	% of Total
Full Scope:																
Lafayette	22.8	2.1	13.8	6.5	16.7	16.8	46.8	69.8	1	8.5	6.2	5.7	8.5	10.2	929	7.1
Lincoln	23.3	1.9	15.2	5.6	15.8	11.1	45.7	74.1	8	3.4	3.8	1.3	2.8	4.3	54	0.4
New Orleans	25.1	3.0	15.6	9.9	18.8	18.8	40.6	62.1	2	6.4	4.0	5.3	6.6	8.4	3,522	27.1
Shreveport/Bossier City	23.3	3.3	15.5	10.6	19.4	20.0	41.9	61.0	2	9.7	7.4	9.8	11.0	11.7	1,600	12.3
Limited Scope:																
Alexandria***	24.0	1.6	16.5	7.8	18.9	22.7	40.6	60.9	NA	NA	NA	NA	NA	NA	128	1.0
Baton Rouge	23.4	3.1	14.6	10.3	18.7	21.5	43.3	59.1	2	11.7	6.8	8.4	12.3	15.3	3,007	23.1
Houma	24.1	2.5	15.3	7.3	19.7	22.6	40.9	64.0	2	13.4	9.2	14.3	16.9	14.2	1,322	10.2
Lake Charles	23.8	4.7	16.3	10.5	19.3	21.1	40.7	59.7	2	13.0	10.3	12.8	12.7	15.0	1,096	8.4
Monroe	24.9	3.7	16.0	7.2	17.6	17.2	41.5	66.2	1	11.6	10.1	10.4	11.2	14.4	950	7.3
Non-metro	23.9	1.0	15.5	6.2	16.7	11.4	43.9	75.7	5	4.4	0.8	4.0	3.7	5.2	404	3.1

(\*) As a percentage of loans with borrower income information available. No information was available for x.x% of loans originated by Bank One, Louisiana, NA

(\*\*) Based on 1998 Aggregate HMDA Data only.

(\*\*\*) Based on 1999 Bank One, Louisiana, NA HMDA data. Alexandria became a Bank One assessment area in November 1998.

**Table 10. Borrower Distribution of Small Business Loan Originations**

Borrower Distribution: SMALL BUSINESS			State: LOUISIANA				Evaluation Period: JANUARY 1, 1997 TO JUNE 30, 1999				
MSA /Assessment Area	Business with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans		
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,00 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full Scope:											
Lafayette	70.2	49.1	61.7	77.1	12.6	10.3	19.0	16.0	1,193	11.3	101
Lincoln	72.7	65.3	82.6	80.0	10.6	9.4	30.4	95.2	634	6.0	89
New Orleans	72.6	51.5	63.4	77.8	13.1	9.0	6.1	4.3	1,827	17.3	97
Shreveport	70.8	52.8	73.9	75.2	14.5	10.3	24.5	18.5	2,110	20.0	113
Limited Scope:											
Alexandria	69.2	60.2	NA	85.6	7.2	7.2	NA	NA	83	0.8	73
Baton Rouge	67.9	46.1	73.8	78.1	13.4	8.5	12.8	8.0	1,604	15.2	93
Houma	70.7	49.3	61.9	80.9	10.3	8.8	13.28	10.8	603	5.7	89
Lake Charles	69.5	55.6	65.5	85.8	11.8	5.4	20.7	17.1	795	7.5	76
Monroe	69.5	58.9	74.5	82.2	10.4	7.4	20.6	17.4	1,073	10.2	74
Non-metro	71.2	60.1	76.9	89.7	6.6	3.7	12.8	9.7	651	6.2	63

(\*) As a percentage of businesses with known revenues.

(\*\*) As a percentage of loans with revenue information available. No information was available for 9% of loans originated by BANK ONE LOUISIANA, N.A.

(\*\*\*) The market consists of all other Small Business reporters in BANK ONE LOUISIANA, N.A.'s assessment area and is based on 1997 Aggregate Small Business Data only.

(\*\*\*\*) Based on 1998 Aggregate Small Business Data only.

**Table 11. Borrower Distribution of Small Farm Loan Originations -**

Borrower Distribution: SMALL FARM			State: LOUISIANA				Evaluation Period: JANUARY 1, 1997 TO JUNE 30, 1999				
MSA /Assessment Area	Farm with Revenues of \$1 million or less		Loans by Original Amount regardless of Farm Size			Market Share****		Total Small Farm Loans			
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,00 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full Scope:											
Lafayette	73.8	75.0		7	0	1			8	4.3	90
Lincoln	72.7	87.0		16	5	2			23	12.3	94
New Orleans	75.2	20.0		4	1	0			5	2.7	61
Shreveport	73.6	65.4		35	10	7			52	27.8	111
Limited Scope:											
Alexandria											
Baton Rouge	69.7	0.0		0	0	0			0	0.0	0
Houma	75.1	100.0		1	0	0			1	0.5	50
Lake Charles	74.3	100.0		8	7	0			15	8.0	85
Monroe	73.0	97.1		17	14	4			35	18.7	127
Non-metro	75.3	93.8		30	12	6			48	25.7	116

(\*) As a percentage of Farms with known revenues.

(\*\*) As a percentage of loans with revenue information available. No information was available for 9% of loans originated by BANK ONE LOUISIANA, N.A.

(\*\*\*) The market consists of all other Small Farm reporters in BANK ONE LOUISIANA, N.A.'s assessment area and is based on 1998 Aggregate Small Farm Data only.

(\*\*\*\*) Based on 1998 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS 1999		State: LOUISIANA						Evaluation Period: January 1, 1997 TO June 30,				
MSA/Assessment Areas	Prior Period Investments*			Current Period Investments			Total Investments			Unfunded Commitments		
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$=s
Full-Scope:												
Lafayette	2	4703	81.3	10	1082	18.7	12	5785	100			
Lincoln	4	44	3.7	18	1201	96.3	22	1245	100			
New Orleans	6	6646	51.2	24	6343	48.8	30	12989	100			
Shreveport	2	862	51.3	37	818	48.7	39	1680	100			
Limited Scope:												
Alexandria	1	72	17.8	8	330	82.2	9	402	100			
Baton Rouge	16	4150	53.0	71	3678	47.0	87	7828	100			
Houma	3	1228	80.3	5	302	19.7	8	1530	100			
Lake Charles	1	100	19.3	4	420	80.7	5	520	100			
Monroe	1	127	7.3	15	1598	92.7	16	1725	100			
Non-metro	8	1217	46.3	30	325	53.7	38	1542	100			

(\*) APrior Period Investments means investments made in a previous evaluation period that remain outstanding.

(\*\*) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

**Table 13. Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
State: LOUISIANA																	
Evaluation Period: January 31, 1997 TO June 30, 1999																	
MSA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope:																	
Lafayette	10.2	20	8.9	0.0	20.0	30.0	50.0	29	9.1	6.9	13.8	20.7	58.6	3.5	31.0	33.9	31.7
Lincoln	2.6	10	4.5	0.0	0.0	50.0	50.0	11	3.5	0.0	18.2	36.4	45.5	0.0	23.2	40.9	35.9
New Orleans	41.6	55	24.6	0.0	21.8	30.9	47.3	111	34.3	3.7	19.3	28.4	50.5	11.8	21.0	35.0	32.2
Shreveport	7.7	27	12.1	11.1	14.8	48.1	25.9	30	9.4	10.0	6.7	53.3	30.0	7.5	24.2	38.4	29.8
Limited Scope:																	
Alexandria	4.0	10	4.5	0.0	0.0	60.0	40.0	11	3.5	0.0	9.1	54.5	27.3	7.9	22.7	43.6	25.5
Baton Rouge	15.4	45	20.1	4.4	13.3	33.3	48.9	55	17.3	12.7	14.5	25.5	47.3	13.7	16.7	34.6	35.1
Houma	3.9	16	7.1	0.0	6.3	75.0	18.8	20	6.3	0.0	10.0	75.0	15.0	0.0	10.4	74.5	14.8
Lake Charles	5.6	13	5.8	0.0	15.4	46.2	38.5	16	5.0	0.0	25.0	43.8	31.3	6.6	16.0	50.9	26.4
Monroe	7.0	16	7.1	18.8	25.0	31.3	25.0	21	6.6	19.0	19.0	38.1	23.8	18.9	17.7	35.8	27.6
Non-metro	2.0	12	5.4	0.0	8.3	25.0	66.7	16	5.0	0.0	18.8	18.8	62.5	0.0	17.8	54.6	27.6