

# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

Public Disclosure

January 6, 2003

Community Reinvestment Act  
**Performance Evaluation**

**Whitney National Bank  
Charter Number: 14977**

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New Orleans, Louisiana 70130**

**Office of the Comptroller of the Currency**

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

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## Overall CRA Rating

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

The following table indicates the performance level of **Whitney National Bank** with respect to the lending, investment, and service tests:

Performance Levels	Whitney National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory		X	
Low Satisfactory			
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 lending volume is high given its size and competition in its primary markets.
- The bank made a very substantial majority of its Home Mortgage Disclosure Act loans and small loans to businesses inside the bank’s Assessment Areas.
- Whitney's overall geographic distribution is good. The borrower distribution of loans is also good.
- The bank originated a highly significant number and dollar amount of community development loans during the review period, the majority of which originated since 1999, which had a positive impact on the Lending Test rating.
- The use of innovative and flexible loan products enhances the bank’s performance under the lending test.
- The bank has a good level of qualified community development investments given its resources and capacity.
- Service delivery systems are readily accessible to all geographies and individuals of different income levels in most AAs.
- Community development services heavily support the bank’s other community development efforts and address identified needs in the community. These services had a positive impact on the Service Test rating.

## Definitions and Common Abbreviations

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

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

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental 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.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

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

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

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited 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, and branch distribution).

**Low-Income:** Individual income that is less than 50% of the area median income, or a median family income that is less than 50%, in the case of a geography.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of

individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any primary metropolitan statistical area (PMSA), metropolitan statistical area (MSA), or consolidated metropolitan area (CMSA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**Middle-Income:** Individual income that is at least 80% and less than 120% of the area median income, or a median family income that is at least 80% and less than 120%, in the case of a geography

**Moderate-Income:** Individual income that is at least 50% and less than 80% of the area median income, or a median family income that is at least 50% and less than 80%, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

**Upper-Income:** Individual income that is more than 120% of the area median income, or a median family income that is more than 120%, in the case of a geography.

## Description of Institution

Whitney National Bank (Whitney) is an interstate bank with its main office in New Orleans, Louisiana. It operates 127 branches and 213 ATMs in five states, and has defined six assessment areas (AAs) in Louisiana, one AA in Texas, one AA in Mississippi, three AAs in Alabama, and two AAs in Florida. These AAs are described in detail in the market profile section of this evaluation (Appendix C).

Whitney is wholly-owned by Whitney Holding Corporation, a one-bank holding company with assets over \$7 billion. In 1995, the Whitney Community Development Corporation (Whitney CDC) was formed to promote and provide affordable housing in the bank's AAs. The activities of the Whitney CDC are considered here in evaluating the bank's CRA performance. Whitney does not have any other affiliates or operating subsidiaries that influence the bank's capacity to lend or invest in the community.

As of September 30, 2002, Whitney reported total assets of \$6.98 billion, and a Tier One Capital ratio of 8.43 %. The loan to deposit ratio was 74.47%. The percentage of total assets represented by net loans was 62%. No legal, financial or other factors impede the bank's ability to help meet the credit needs in its AAs.

Whitney has grown considerably during the evaluation period, acquiring three banks in 1996, two in 1997, four in 1998, two in 2000, and three in 2001. All of the acquired banks have been merged into Whitney. Through these acquisitions, the bank doubled the number of branches it operates and increased its assets by more than one-third.

Whitney's deposit market share rank in the AAs receiving full scope reviews ranges from 3<sup>rd</sup> in New Orleans with a 15% market share out of 123 deposit-taking institutions, to 17<sup>th</sup> in Houston with a market share of 0.71% out of 205 institutions. Banking competition is aggressive in all of Whitney's markets, particularly in New Orleans and Houston, and includes dominant affiliates of large national banking companies, a large national bank headquartered in New Orleans, and numerous small community banks, credit unions, and non-bank financial service providers.

Traditionally, Whitney has been a prominent commercial lender in its various markets. The bank makes commercial loans of all types and sizes including commercial/industrial, commercial mortgage, business credit card, and construction/land development loans. Examples of loans to retail customers include residential mortgages of all types, residential construction loans, personal loans (including lines of credit), and auto loans. Over the past few years, Whitney has expanded its business strategy and is now a prominent HMDA lender in the state of Louisiana.

The loan portfolio is comprised of 54% real estate loans, 37% commercial loans, and 5% loans to individuals. Farm and agricultural loans comprise only 1% of the total loan portfolio. The real estate loan portfolio consists of 44% non-residential loans, 35% 1-4 family residential loans, 19% construction-development loans, and 2% multi-family loans.



We noted during the conducting and review of twelve community contacts made in the AAs that many opportunities exist in the bank's markets to participate in community development lending, investment, and service activities. Houston and New Orleans have very high levels of opportunities and capacity for community development. The primary needs identified by the community contacts are affordable housing, small business loans, and technical assistance (financial education).

In recent years, Whitney has demonstrated a strong commitment to and is very active in affordable housing efforts in its assessment areas. The Whitney Community Development Corporation was formed in 1995 to act on this commitment. It is involved in the construction, rehabilitation, and financing of affordable housing. In addition, bank personnel provide significant expertise to a wide variety of governmental agencies, as well as non-profit and economic development organizations that promote home ownership and financial independence. These efforts are detailed in the Community Development Lending and Community Development Services sections of this Performance Evaluation.

Whitney's CRA performance was last evaluated on June 6, 1996, at which time the bank was rated "Satisfactory." A review of OCC records and the bank's CRA Public File did not reveal any complaints relating to the bank's CRA performance.

## **Scope of the Evaluation**

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

This Performance Evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. In evaluating the bank's lending performance, we reviewed Whitney's residential mortgage loans and small business loans. Farm and multi-family real estate loans comprise less than 1% of the bank's loan portfolio, respectively, and are not considered in the evaluation of the bank's performance. The bank did not elect to have us include consumer loans, which represent only 5% of the loan portfolio. The evaluation period under the Lending Test was January 1, 1996, when the bank began collecting data under the revised CRA regulation, through December 31, 2002.

For community development (CD) loans and the Investment and Service Tests, the evaluation period is also January 1, 1996 through December 31, 2002. The Investment Test conclusions are based on an evaluation of investments, grants, and donations made in the bank's AAs that meet the definition of community development. The Service Test was evaluated based on branch distribution, hours of operation, branch openings and closings, alternative delivery systems, retail and commercial deposit and loan products and services, and community development services.

### **Data Integrity**

Prior to this CRA examination, OCC personnel verified the accuracy of data 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. In addition, non-public data that was submitted by bank management for CD loans, services, and investments were reviewed to ensure they qualified as community development. Based on verification work performed, publicly reported lending data is considered accurate. All the data reported for the above categories were used in this evaluation.

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

In each state where the bank has an office, a sample of assessment areas (AAs) within that state was selected for full-scope review based on Whitney's operations in the state and the amount of business derived from that AA. Refer to the "Scope" section under each state rating for details regarding how the areas were selected and why they are representative.

### **Ratings**

The bank's overall rating is a blend of the state ratings. We gave the bank's performance in Louisiana significant weight when deriving the overall bank rating. This is because Louisiana accounts for approximately 65% of the branch network, 77% of deposits, and 80% of the number of CRA reportable loans during this CRA evaluation period. The state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

### **Fair Lending Review**

An analysis of the most recent public comments, consumer complaint information, and HMDA, small business and small farm lending data, was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with this CRA evaluation.

## State Ratings

### State of Louisiana

<b>CRA Rating for Louisiana:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>High Satisfactory</b>
<b>The Service Test is rated:</b>	<b>Outstanding</b>

The major factors that support this rating include:

- Whitney has demonstrated excellent responsiveness to credit needs within the New Orleans AA. CRA reportable loan volume in Louisiana is excellent, particularly for small loans to businesses and home improvement loans.
- Whitney made a very substantial majority of its Home Mortgage Disclosure Act (HMDA) loans and small loans to businesses inside the bank's Louisiana AAs.
- The geographic distribution of reportable loans originated in Louisiana is good. The borrower distribution of loans is also good.
- The bank originated a highly significant number and dollar amount of community development loans in Louisiana during the review period, mostly since 1999, which had a positive impact on the Lending Test rating.
- The use of innovative and flexible loan products enhances the bank's performance under the Lending Test.
- The bank has a good level of qualified community development investments in Louisiana given its resources and capacity.
- Service delivery systems are accessible to essentially all geographies and individuals of different income levels.
- An excellent level of community development services heavily supports the bank's other community development efforts and addresses identified needs in the community. These services had a positive impact on the Service Test rating.

### Description of Institution's Operations in Louisiana

Whitney operates 83 branches and 147 ATMs within six AAs in the state of Louisiana. The Louisiana AAs include five metropolitan areas: New Orleans, Baton Rouge, Houma/Thibodaux, Lafayette, and Lake Charles; and one non-metropolitan area, Morgan City/St Mary Parish. Approximately 77% of the bank's total deposits were

attributed to these AAs. In addition, the bank originated approximately 80%, by number and 78% by dollar volume, of its total reported loans in these AAs.

The bank's primary market continues to be New Orleans. The New Orleans AA represents approximately 47% of the bank's Louisiana branch network, 67% of the bank's Louisiana deposit base, and 66% of CRA reportable loan volume in Louisiana for this CRA evaluation period. The Baton Rouge AA is the next largest market and represents approximately 18% of the bank's branch network, 11% of the bank's deposit base, and 12% of CRA reportable loan volume for this CRA evaluation period. The other assessment areas comprise between 7% and 11% of the branch network, between 5% and 8% of the bank's deposit base, and between 4% and 7% of CRA reportable loan volume for this evaluation period.

Whitney's deposit market share rank in the state of Louisiana is 4<sup>th</sup> with a market share of 7.85% out of a total of 465 deposit taking institutions. State banking competition is aggressive and includes dominant affiliates of large national banking companies, a large national bank headquartered in New Orleans, and numerous small community banks, credit unions, and non-bank financial service providers. The top five competitors in this market include: Bank One, Hibernia National Bank, Regions Bank, Hancock Bank, and Amsouth Bank, all of which compete directly with Whitney in its various markets.

Traditionally, Whitney has been a prominent commercial lender in its Louisiana markets. Over the past few years, Whitney has expanded its business strategy and is now a prominent HMDA lender in the state of Louisiana. The bank makes commercial loans of all types and sizes including commercial/industrial, commercial mortgage, business credit cards, and construction/land development loans. Examples of loans to retail customers include residential mortgages of all types, residential construction loans, personal loans (including lines of credit), and auto loans.

Refer to the Market Profiles for the State of Louisiana in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## **Scope of Evaluation in Louisiana**

We evaluated the bank's performance in the State of Louisiana by performing a full-scope review of the New Orleans AA and limited scope reviews of the Baton Rouge, Houma, Lafayette, and Lake Charles AAs; and the Morgan City non-metropolitan AA. We selected the New Orleans AA for a full-scope review because the bank maintains a substantial share of its business within this AA: approximately 67% of the deposits in Louisiana and 66% of reportable loan originations during the evaluation period. Additionally, the New Orleans MA is where the highest concentration of branches is located and Whitney has a long history of serving this market. Please refer to the table in Appendix A for more information.

The bank's overall rating is based primarily on those areas that received full-scope reviews. Small business lending performance was given the greatest weight under the

lending test since it is the bank's primary business line, followed by home mortgage loans. We gave more weight to home improvement lending, since the bank's originations for this product represent a higher proportion of total home mortgage loans than refinance and home purchase loans. Significant consideration was given to the bank's lending performance in the New Orleans AA. This is due to the higher volume of lending, especially small loans to businesses, which is one of the primary product lines at Whitney.

We assessed CRA performance for the entire evaluation period, and also for two time periods: January 1, 1996 through December 31, 1998 and January 1, 1999 through December 31, 2002. We separated the bank's performance for these time periods so Whitney's CRA performance could be compared to other institutions that have received a CRA performance evaluation for a 3 to 4 year evaluation period. We gave slightly more weight to the bank's performance under the most recent 4-year evaluation period (January 1, 1999 through December 31, 2002) than the former 3-year period. The entire evaluation period was considered when deriving the bank's final CRA rating.

The geographic distribution of multi-family loans and the geographic and borrower distribution of small loans to farms are not relevant due to the small volume of loans originated or purchased during the evaluation period. Therefore, an analysis of the geographic distribution of multi-family loans and the geographic and borrower distribution of small loans to farms has been eliminated from the Public Evaluation.

## **LENDING TEST**

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

The bank's performance under the lending test is rated "Outstanding". Based primarily on the bank's performance in the New Orleans AA, which received a full-scope review, the bank's performance is excellent.

Whitney's rating was based primarily on its exceptionally strong lending performance in making small loans to small businesses, which was enhanced by strong community development lending targeted towards affordable housing.

### **Lending Activity**

Refer to Table 1 Lending Volume in the State of Louisiana section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Whitney's lending activity demonstrates excellent responsiveness to the credit needs of its AA considering its size, resources, deposit market share, and primary business focus. Small business lending and home mortgage lending is essential to the local economy. Whitney's deposit market share of 15% (\$2.7 billion) ranks third among 123 financial institutions with offices in the New Orleans AA. Those institutions with a greater market share include Hibernia National Bank and Bank One NA, which captured

26% and 21% of the market, respectively, and are significantly larger than Whitney in total assets.

In the New Orleans AA, approximately 60% of the number and 66% of the dollar amount of Whitney's reported loans were small loans to businesses. Approximately 40% of the number and 34% of the dollar amount were home mortgage loans. Among the home mortgage loans originated in the New Orleans AA, approximately 42% were for home improvement, 34% for refinance, and 24% for home purchase.

Business lending activity is strong. Whitney reported 20,003 business loans totaling \$2.2 billion over the evaluation period. Whitney originated 12.9% of all reported 2001 small loans to businesses in the New Orleans AA, ranking third among 90 lenders and first among all banks. Whitney's lending performance to small businesses with revenues less than \$1 million is even stronger. Whitney originated 14.7% of all reported 2001 small loans to small businesses in the New Orleans AA, ranking second among 89 lenders and first among all banks. In addition, Whitney's lending volume in home mortgage products is strong. Whitney ranks number three in home mortgage lending originations with a 5.7% market share. Overall, reportable loan volume is considered strong given the large number of non-bank financial providers making both home mortgages and small loans to businesses in the New Orleans AA.

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

The geographic distribution of Whitney's CRA reportable loans is good. The geographic distribution of home mortgage loans is adequate and the geographic distribution of small loans to businesses is excellent.

Refer to Tables 2 - 6 in the State of Louisiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan origination and purchases in the New Orleans AA.

### ***Home Mortgage Loans and Small Loans to Businesses***

Refer to the following table for conclusions reached on the bank's geographic distribution of home mortgage loan originations for home purchase, home improvement, and refinance products. The analysis focuses separately on low- and moderate-income geographies, and performance is considered good to excellent, depending on the market profile (see Appendix C), if the percentage of loans originated and purchased in those geographies is near to or exceeds the percentage of owner-occupied housing units in those geographies. The other measure of performance is the comparison of the bank's overall market share of home purchase loans originated and purchased in the AA to the bank's market share of home purchase loans in each income level of geography in that AA. The bank's performance within an AA is considered good to excellent, depending on the bank's market profile (See Appendix C), if its market share in low- and moderate-income geographies substantially meets or exceeds its overall market share.

Also, refer to the following table for conclusions reached on the bank’s geographic distribution of small loans to business originations. The analysis focuses separately on low-and moderate-income geographies, and performance is considered good to excellent, depending on the bank’s market profile (see Appendix C), if the percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in those geographies is near to or exceeds the percentage of businesses located in those geographies. The other measure of performance is the comparison of the bank’s overall market share of small loans to businesses in the AA to the bank’s market share of small loans to businesses in each income level of geography in that AA. The bank’s performance within an AA is considered good to excellent, depending on the bank’s market profile (see Appendix C), if its market share in low- and moderate-income geographies substantially meets or exceeds its overall market share.

We gave weight to both performance evaluation methods (demographic and market share) when deriving conclusions for the geographic distribution of small loans to businesses and home mortgage loans. We placed less emphasis on the market share data analysis during the earlier part of the evaluation period (1996 – 1998) since 2001 market share information is not relevant to this time period. We gave equal weight to market share data during the latter part of the evaluation period (1999 – 2002). The following table displays our conclusions for geographic distribution by each reportable loan product for low and moderate-income census tracts. The table shows the bank’s performance during the January 1, 1996 through December 31, 1998 and January 1, 1999 through December 31, 2002 time periods.

Product	Geographic Distribution 1996-1998			Geographic Distribution 1999-2002		
	Low	Mod	Overall	Low	Mod	Overall
Home Purchase	E	A	Good	A	A	Adequate
Home Improvement	E	A	Good	E	G	Good
Refinance	P	P	Poor	P	P	Poor
Small Business	E	E	Excellent	E	E	Excellent
Overall Lending	E	G	Good	G	G	Good
<b>Overall Conclusion (96-02)</b>						<b>GOOD</b>

A – Adequate, E – Excellent, G – Good, P – Poor, VP – Very Poor, NA – Not Applicable

***Lending Gap Analysis***

Reports and maps detailing Whitney's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained gaps were identified.

***Inside/Outside Ratio***

This analysis was performed at the state level. A very substantial majority of Whitney’s home mortgage loans and small loans to businesses were originated/purchased within

its AAs. By product, the bank originated the following percentages of loans inside its Louisiana AAs:

<b>Loan Type</b>	<b>% Inside</b>
Home Purchase	97
Refinance	96
Home Improvement	97
Small Loans to Businesses	97
<b>Overall</b>	<b>97</b>

This performance was positively factored in the overall analysis of the geographic distribution of lending.

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

Whitney’s distribution of home mortgage loans to borrowers of different income levels is adequate. The distribution of loans to businesses of different sizes is good. The bank achieved adequate penetration to LMI borrowers with its home mortgage lending. Penetration to businesses with revenues of \$1 million or less is good.

Refer to Tables 8 – 11 in the State of Louisiana section of Appendix D for the facts and data used to evaluate the borrower distribution for the bank’s loan originations and purchases in the New Orleans AA.

***Home Mortgage Loans and Small Loans to Businesses***

Refer to the following table for conclusions reached on the bank’s borrower distribution of home mortgage loan originations for home purchase, home improvement, and refinance products. The analysis focuses on performance in lending to low- and moderate-income borrowers. Performance in lending to low-income borrowers can be considered good to excellent even though the percentage of loans originated and purchased to such borrowers is lower than the percentage of low-income families in the AA. This guideline recognizes the barriers that lenders may face in originating home purchase loans to low-income borrowers. Performance in lending to moderate-income borrowers is considered good to excellent, depending on the bank’s market profile (See Appendix C), if the percentage of loans originated and purchased to moderate-income borrowers is near to or exceeds the percentage of moderate-income families in the AA. The other measure of performance for borrower distribution is a comparison of the bank’s market share of home purchase loans originated and purchased in an AA to the bank’s market share of home purchase loans to each income level of borrower in that AA. The bank’s performance within an AA is considered good to excellent, depending on the bank’s market profile (See Appendix C), if its market share to low- and moderate-income borrowers substantially meets or exceeds its overall market share.

Also, refer to the following table for conclusions reached on the bank’s performance in making loans to businesses of different sizes. The data provided to analyze the bank’s performance under this criterion include the percentage of businesses within the AA that



have revenues of \$1 million or less (demographic data) and the percentage of reported small loans to businesses that were originated and purchased to businesses with revenues of \$1 million or less. The percentage of bank lending that went to small businesses compared to the percentage of businesses within the AA that have revenues of \$1 million or less provides an indication of the bank’s performance relative to the need within the community. Performance that substantially meets or exceeds the performance reflected by the demographic data is considered good to excellent. The other measure of performance is a comparison of the bank’s market share of small loans to businesses with annual revenues of \$1 million or less to the bank’s overall market share in making small loans to businesses. Performance is considered good to excellent, based on the bank’s market profile (See Appendix C), if the bank’s market share of loans to small businesses substantially meets or exceeds the bank’s overall market share.

Due to the expensive cost of housing compared to the relatively low-incomes and high poverty rates of the residents of the New Orleans AA, we placed a little more emphasis on the market share analysis than the demographic benchmark approach when deriving conclusions for borrower distribution of mortgage loans. This was done because the affordability of housing does not influence the market share data. Refer to Appendix C for additional performance context issues.

We equally weighted the two performance measurements (demographic data and market share) to derive an overall conclusion as to the bank’s performance in making loans to businesses of different sizes during the 1999 through 2002 portion of the evaluation period. We placed more emphasis on the demographic performance measurement analysis during the 1996 through 1998 portion of the evaluation period since 2001 market share data is not relevant to this time period.

The following table shows our conclusions by each reportable loan product for borrower distribution and small loans to businesses of different sizes. Specifically, the table shows conclusions reached for lending distribution to low- and moderate-income borrowers and to small businesses with revenues equal to or less than \$1 million. The table shows the bank’s performance during the January 1, 1996 through December 31, 1998 and January 1, 1999 through December 31, 2002 time periods.

Product	Borrower Distribution 1996-1998				Borrower Distribution 1999-2002			
	Low	Mod	<\$1mm	Overall	Low	Mod	<\$1mm	Overall
Home Purchase	A	E	NA	Good	G	E	NA	Good
Home Improvement	P	G	NA	Adequate	A	G	NA	Good
Refinance	P	A	NA	Adequate	P	A	NA	Adequate
Small Business	NA	NA	E	Excellent	NA	NA	G	Good
Overall Lending	P	G	E	Good	A	G	G	Good
<b>Overall Conclusion (96-02)</b>								<b>GOOD</b>

A – Adequate, E – Excellent, G – Good, P – Poor, VP – Very Poor, NA – Not Applicable

## Community Development Lending

Refer to Table 1 Lending Volume in the State of Louisiana section of appendix D for the facts and data used to evaluate the bank's level of community development (CD) lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending had a positive impact on the Lending Test conclusions. Whitney's level of CD lending is excellent and enhances its overall good level of home mortgage lending in the New Orleans AA and in the State of Louisiana. During the evaluation period, Whitney made a total of 301 CD loans totaling \$153 million representing approximately 50% of the bank's total Tier One Capital allocated to New Orleans as of December 31, 2002. Nearly 70% of the number and dollar of CD loans were originated since 1999.

Bank management and community contacts identified affordable housing and technical assistance as pressing needs in the New Orleans AA. Whitney demonstrated an excellent level of responsiveness to the need for affordable housing. A large number of CD loans were extended to builders who specialize in development and rehabilitation of affordable single-family residences and multi-family dwellings in economically depressed low- and moderate-income geographies. For example, the Whitney CDC made 167 loans totaling \$15.2 million to builders and non-profit entities to construct or rehabilitate 183 affordable 1-4 family residences. Other significant CD loans include more than 30 loans originated by the bank for the purchase and rehabilitation of affordable multi-family housing throughout the AA, totaling more than \$72 million. The areas benefiting from this significant amount of affordable housing activity include neglected and/or abandoned neighborhoods, including city or nationally designated historic districts. The bank's commitment to increasing the stock of affordable housing in New Orleans, and in its other assessment areas, is demonstrated by these numbers.

Other projects support non-profit providers of community services targeted to low- and moderate-income individuals and families. Bridge House, Kingsley House, Shelter Resources and Goodwill Industries are just a few of the bank's CD loan customers.

In 2001, Whitney lent more than \$13 million to construct a Title II Charter School on the Belle Chasse Naval Air Station. It is the first charter school in the nation to be constructed on a military installation. The school will alleviate overcrowding at area public schools, and serves low- and moderate-income families. It is located adjacent to newly constructed, affordable military housing. The loan is guaranteed by the USDA Rural Development Agency.

One project that benefited from Whitney financing was the conversion of an under-utilized office building to a hotel in downtown New Orleans, in a designated area of the Enterprise Zone Program of the Louisiana Department of Economic Development. Whitney funded 4 loans and 7 renewals, totaling \$32 million since the first loan in 1998.

The hotel conversion created more than 480 permanent service-related jobs primarily benefiting low- and moderate-income individuals.

## **Product Innovation and Flexibility**

The use of innovative and flexible loan products enhances the bank's performance under the lending test, and positively impacted the rating. Specifically, the bank offers residential loan programs that benefit low- and moderate-income individuals and geographies.

### Whitney Neighborhood Housing Program

This program is designed to assist low- and moderate-income buyers who cannot qualify for traditional financing. Flexible characteristics of the product include no origination fee or discount points, no reserve requirements, and flexible underwriting criteria such as expanded debt to income ratios, 97% financing, terms up to 30 years, acceptance of nontraditional credit references, one year employment requirement, and one year credit history requirement. Due to the flexible underwriting characteristics, Whitney retains these loans in its loan portfolio. Whitney originated 115 loans totaling \$6.2 million in the state of Louisiana between January 1, 1999 and December 31, 2002, and 397 loans totaling approximately \$23 million from January 1, 1996 through December 31, 1998.

### Whitney Neighborhood Housing Program – REHAB

This program is designed to assist low to moderate income buyers who cannot qualify for traditional financing and/or the property needs rehab that cannot be completed as a condition of the sale, prior to closing. Housing rehabilitation has been identified as a critical credit need in the city of New Orleans. The program provides the purchaser the ability to close the loan and include escrow funds for the repairs if certain criteria and other conditions are met. This product contains flexible characteristics such as no origination or discount points, low \$100 construction-monitoring fee, no private mortgage insurance requirement, no reserve requirements, and flexible underwriting criteria such as expanded debt to income ratios, 97% loan to value requirement plus 100% of the improvements not to exceed 100% of the completed appraised value, and acceptance of nontraditional credit references. Due to the flexible underwriting characteristics, Whitney retains these loans in its loan portfolio. Whitney originated 26 loans totaling \$1.7 million in the state of Louisiana between January 1, 1999 and December 31, 2002, and 15 loans totaling \$824 thousand from January 1, 1996 through December 31, 1998.

### Home of My Own Program

This is a collaborative program among Whitney National Bank, The Human Development Center of Louisiana State University, and an approved non-profit. This initiative is designed to assist individuals whose lives are influenced by disabilities (cognitive, developmental, and physical) to become homeowners. The product contains flexible terms and underwriting characteristics such as no origination or discount points, no application fee, terms up to 30 years, 97% financing (borrower's contribution is limited based on income), no reserve requirements, no private mortgage insurance

requirements, expanded debt to income ratio requirements, reduced credit history requirements, and non traditional credit references are accepted. Due to the flexible underwriting characteristics, Whitney retains these loans in its loan portfolio. The bank originated 17 loans totaling \$782 thousand in the state of Louisiana between January 1, 1999 and December 31, 2002, and 11 loans totaling \$447 thousand from January 1, 1996 through December 31, 1998.

#### Leveraged Loan Program

This program leverages funds with Rural Housing, a division of the U.S. Department of Agriculture. The program targets individuals and families with incomes at 80% or less than the median income. Whitney NB provides a first mortgage of less than 50% loan to value and Rural Housing provides a second mortgage. Whitney's participation reduces the amount the agency must provide thereby maximizing the use of government funding. This program contains flexible terms and underwriting characteristics including terms up to 30 years, no cash required from the borrower for the down payment, no origination fee or discount points, expanded debt to income ratios, no private mortgage insurance required, acceptance of nontraditional credit references, reduced credit history requirements, and no reserve requirements. Due to the flexible underwriting characteristics, Whitney retains these loans in its loan portfolio. Whitney originated 10 loans totaling \$188 thousand in the state of Louisiana between January 1, 1999 and December 31, 2002, and 9 loans totaling \$185 thousand from January 1, 1996 through December 31, 1998.

#### Community Development Consumer Loans

This loan program provides accessible and affordable financing to those low- to moderate-income applicants who do not meet traditional underwriting guidelines. This program contains flexible terms and underwriting guidelines such as an expanded debt to income ratio, one year employment requirement, consideration of nontraditional credit references, loan amounts up to \$5,000, no collateral requirements, and terms up to 48 months. Loan volume in this product over the evaluation period is unknown.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Baton Rouge, Lafayette, and Lake Charles AAs and in the Morgan City non-metropolitan AA is not inconsistent with the bank's overall "Outstanding" lending test performance in Louisiana. Overall, these limited scope reviews indicate that there are some portions of the lending test that are stronger and weaker than the overall state performance, however, after considering strong community development lending, the overall lending test rating for these areas is not inconsistent with the overall lending test rating for the state. In the Houma AA, the bank's performance is weaker than the bank's overall performance in the state. This is because the bank's level of community development lending in the Houma AA is significantly lower than the other AAs in the state.

Refer to the Tables 1 -12 in the state of Louisiana section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Louisiana is rated "High Satisfactory". Based on our full-scope review, the bank's performance in the New Orleans AA is good.

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

Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose community development, as defined in the CRA regulation. Whitney has some complex and innovative investments, and all are beneficial to and meet identified needs in the New Orleans AA and in the State of Louisiana. In New Orleans, 45 investments and 253 grants and donations had community development purposes and total \$5.9 million for the review period. An additional allocation of 29 bank-wide investments of \$3 million is attributed to New Orleans based on the portion of bank deposits from New Orleans (51.2%). The combined total represents 3.16% of the bank's Tier One Capital allocated to Louisiana as of December 31, 2003, based on the Louisiana deposit percentage. Grants, donations, or in-kind contributions that qualified for community development purposes comprise 44% of the dollar total of qualified investments at \$2.6 million. The bank has two investments in New Orleans from the prior evaluation period, including \$1 million invested in the Whitney CDC.

The following descriptions highlight the diversity of the bank's investments and how they meet the identified community development needs and opportunities in Louisiana.

#### The Whitney Community Development Corporation

The bank recognized numerous affordable housing needs and opportunities in its primary market of New Orleans, Louisiana. In response, it formed the Whitney CDC to create and develop specialized loan and residential construction partnerships in the communities the bank serves. The CDC functions as both developer and lender in its operations. The primary focus is affordable housing, but the CDC's efforts have revitalized and stabilized numerous neglected neighborhoods in the bank's AAs. The CDC was initially funded in 1995 with \$1 million in capital and four interest-free lines of credit totaling \$1.8 million from the Whitney Holding Corporation, certified as investments under 12 CFR 24. The lines of credit have grown to \$3.7 million by year-end 2002.

During this evaluation period, the CDC originated 167 community development loans in the New Orleans AA totaling \$15.2 million to builders and non-profit entities across the state to construct or rehabilitate 183 affordable 1-4 family residences. In addition to these loans, 41 direct CDC projects have improved the quality of housing in the New

Orleans AA. More than 80% of the loan activity and half of the projects occurred after 1999.

#### Guilford Capital Funds – Low Income Housing Tax Credits

During the latter part of the evaluation period, Whitney invested in two Guilford Capital Funds backed by low income housing tax credits in several of its assessment areas. The amount invested in housing in the Louisiana AAs total \$2.1 million. The tax credits are related to affordable multi-family housing complexes.

#### Jefferson Capital Partnership

Whitney has committed \$5 million to this innovative business development company. The company provides gap and working capital financing to traditionally unbankable and new small businesses in a large regional area that includes the bank's AAs. The bank funded \$1.1 million of its commitment in 2002.

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

Based on limited-scope reviews, the bank's performance under the Investment Test in the Baton Rouge, Lafayette and Houma/Thibodaux AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the investment test in Louisiana. In the Lake Charles AA and Morgan City non-metropolitan area, the bank's performance is weaker than the bank's overall performance in the state. In both Lake Charles and Morgan City, the investment level is adequate at 1.31 and 1.17% of Tier One Capital, respectively. The bank has made no investments in these AAs other than donations, but the communities benefit from the bank-wide investments. Refer to Table 14 in Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the Service Test in Louisiana is rated "Outstanding". Based on a full-scope review, the bank's performance in the New Orleans AA is excellent.

### **Retail Banking Services**

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

Whitney's service delivery systems are accessible to essentially all geographies and individuals of different income levels throughout the New Orleans AA. The bank operates 39 branches, representing 47% of all branches in Louisiana. The percentage of branches in low-income tracts is lower than the percentage of population residing in those tracts. Less than 12% of the New Orleans population resides in low-income

geographies. The percentage of branches located in moderate-income tracts meets the percentage of population residing in those tracts. Several bank branches are closely proximate to low- and moderate-income geographies and are accessible.

Whitney's record of opening and closing branches is good and has not adversely impacted the provision of financial services to any part of the bank's AA including low- and moderate-income geographies and to low- and moderate-income individuals. Nine new branches were added in the New Orleans AA since the previous review, including two in moderate-income CTs. Three branches were closed, two of which were in moderate-income CTs in downtown New Orleans where the bank has a strong presence, including its main office.

Whitney operates a total of 89 ATMs throughout the New Orleans AA to supplement its delivery system. The dispersion of the ATMs represents a good distribution across the AA, including the low- and moderate-income CTs. Six ATMs, representing 7% of the total, are located in low-income CTs, and twenty-two others, or 25%, are located in moderate-income CTs. Nine of the ATM machines located in low- and moderate-income geographies accept deposits. All external ATMs are available 24-hours a day, seven days a week. However, some ATMs are located inside branch or office buildings and are subject to the hours of operation of the branch or building in which they are located. Bank employees who speak one of 16 different languages are listed in the bank telephone directory so operators may direct calls according to the callers language needs. Several ATMs in the New Orleans AA have bilingual screens.

Whitney's hours, services, and products offered do not vary in a way that inconveniences any portions of the assessment area, including low- and moderate-income CTs and individuals. Banking hours are consistent throughout the AA. The "standard" is 9AM to 4PM Monday through Friday. Drive-up facilities are generally open from 9AM to 5:30PM, with some open 9AM to 1PM on Saturday.

A variety of deposit and loan products, and business services, are available at all Whitney branch locations. In addition to the range of loan and deposit products normally offered by a bank of Whitney's size and complexity, several deposit products are responsive to the needs of low- or moderate-income individuals and small businesses. These products are not only targeted to low- and moderate-income individuals, but provide basic low cost banking products throughout the AA.

#### Individual Development Accounts

These accounts were developed to help first-time homebuyers accumulate funds to purchase a home. Whitney is actively involved in the promotion of these accounts, and in assisting account holders in achieving their goal of homeownership. The bank has opened 71 accounts approximating \$56 thousand since it began offering this product in October 2001.

When the IDA account reaches a balance sufficient to provide a downpayment for a home, Whitney also provides the mortgage product. Whitney has assisted 15 IDA account holders with more than \$1 million in mortgage funds.

### Check & Save

This account is designed to encourage savings by offering a free checking account tied to an interest-bearing savings account with a minimum balance of only \$300. The account includes free unlimited ATM and InfoLine account information services by telephone. The bank also offers business Check & Save accounts, with higher minimum and average daily collected balances.

### Community Edge Checking

A checking account reserved for non-profit and community development organizations that allows for 50 free checks per month, no monthly service fees with a \$500 minimum balance, and free access to Whitney ATMs and the bank's InfoLine services. Funds can be accessed by check, card, phone, or internet.

### Economy Checking

A checking account targeted to those who have limited check-writing needs. There is no opening deposit requirement and only a nominal fee assessed on this account. Account holders receive a limited number of free checks per cycle, unlimited ATM usage at all Whitney ATM locations, and free 24-hour access to the bank's InfoLine services.

### "Economy Edge" Small Business Checking

Business checking for accounts with 100 transactions or less. The account has no balance requirement, and funds can be accessed by check, card, phone, or internet. There is no charge for Whitney ATM, POS or Visa CheckCard transactions, or for transfers between Whitney accounts.

The bank is a preferred SBA lender and participates in the SBA's Small Loan Program designed for loans under \$50,000. Also, the bank offers small business credit cards and merchant sales processing.

Reverse mortgages are offered, primarily utilized by senior citizens to supplement their fixed income using the equity in their homes. Of the sixty-five reverse mortgage applications received by the bank, more than 80% are from low- and moderate-income persons.

## **Community Development Services**

Whitney provides an excellent level of community development services in the New Orleans AA that had a positive impact on the state Service Test rating assigned to the bank.

As described in the Description of the Institution and in the Community Development Lending Sections of this Performance Evaluation, Whitney and its CDC have been very active in the promotion and creation of affordable housing in its assessment areas, particularly in Louisiana. The bank's Community Affairs personnel, several of whom are



officers of the Whitney CDC, devote a substantial amount of time and expertise to creating and increasing affordable housing capacity in Louisiana markets.

Members of the bank's community affairs department possess a high level of expertise in community and economic development, community action, affordable home loan programs, and property management, construction, and renovation. They participate in and lead public forums and meetings with government agencies and economic groups to identify credit needs and CD opportunities. They have developed major projects and programs, and are very active in historic preservation of significant neighborhoods throughout New Orleans. This expertise is shared both in and outside the bank's AAs to expand and create CD opportunities as well as capacity.

Other bank officers possess business acumen that is routinely shared with members of their communities through their participation in business forums and seminars. Officers of the bank, including the bank's President and the Community Affairs staff, participate in numerous community outreach and financial education endeavors. Officers of the bank are represented on national as well as local housing service boards, and finance and advisory committees. Examples of major ongoing services provided by the bank or the Whitney CDC for the primary benefit of low- and moderate-income individuals are:

- Homeownership and credit counseling
- Homebuyer training
- Bank at School in the inner-city
- Community development training for non-profits

Specific bank-wide CD services include:

#### Federal Home Loan Bank Grant Assistance

Bank Community Affairs personnel have assisted a variety of housing development groups in completing 16 applications for affordable housing grants from the Federal Home Loan Bank of Dallas in 2001 and 2002. Five applications totaling \$604 thousand in New Orleans were approved. Most of the grants helped subsidize closing costs and downpayments for first-time low-income homebuyers.

#### Associated Catholic Charities

Bank personnel serve as members of the Finance Committee, National Commission on Housing and Community Development, Home Counseling Advisory Board, and Homeownership Committee.

#### Neighborhood Housing Services of America

The Whitney CDC President has served as board member and member of loan, audit, and development committee of this secondary market affordable housing group. The bank is also very active with local chapters in each of its AAs and states, including holding the office of President of NHS New Orleans.

#### Fannie Mae SW Regional Housing and Community Development Advisory Council and Fannie Mae Louisiana Partnership

Bank personnel serve as Council Member and Member of the Advisory Committee for affordable housing initiatives.

The bank participates in, and often underwrites expenses for, events such as Neighborhood Housing Services festivals, New Orleans Neighborhood Development Collaborative community development training courses, the New Orleans Pro Bono Project, and home buyer seminars, all of which are targeted to low- to moderate-income families. Bank employees also participate in small business development forums, and provide a host of other services targeted towards the AA at large.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Baton Rouge, Lafayette, Lake Charles, and Houma AAs and in the Morgan City non-metropolitan AA is not inconsistent with the bank's overall "Outstanding" performance under the Service Test in Louisiana. Whitney branches are at least reasonably accessible to essentially all geographies and individuals of all income levels, and the bank maintains an excellent level of community development services in all of its Louisiana AAs. Refer to Table 15 in Appendix D for the facts and data that support these conclusions.

## State of Texas

<b>CRA Rating for Texas:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The Service Test is rated:</b>	<b>Outstanding</b>

The major factors that support this rating include:

- Whitney demonstrated good responsiveness to credit needs within the Houston AA.
- Whitney's overall CRA reportable loan volume in Texas is good, particularly for small loans to businesses and home improvement loans.
- Whitney's overall geographic and borrower distribution is good.
- The bank originated an excellent amount of community development loans during the review period, which have a positive impact on the Lending Test rating.
- The level of qualified investments in the Houston AA is excellent.
- Service delivery systems are readily accessible to all geographies and individuals of different income levels in the Houston AA.
- The level of community development services is good and supports the bank's other community development efforts. These services had a positive impact on the Service Test rating.

## Description of Institution's Operations in Texas

Whitney only has one assessment area (AA) within the state of Texas. This AA is the City of Houston only and not the surrounding areas that compose the Houston PMSA. The bank operates nine branches and 13 ATMs in this AA. Approximately 8% of the bank's deposits and 2.7% of the bank's reportable loans originate from this AA. Whitney has a small presence in this market as their loan market share rank in the Houston AA is 17<sup>th</sup> with a market share of .71% out of a total of 205 deposit taking institutions. Whitney's deposit market share rank is 54<sup>th</sup> with a market share of .16% out of a total of 1,465 deposit taking institutions in the State of Texas.

Local banking competition is aggressive and includes affiliates of large national banking companies, regional banks, and numerous small community banks, credit unions, and non-bank financial service providers. The top five competitors in this market include: Bank of America, Bank One, Chase Manhattan Bank, Washington Mutual Bank, and Wells Fargo Bank Texas.

Whitney is a predominantly commercial lender in the Houston market. Approximately 80% of CRA reportable loans in this market are small loans to businesses and 20% are home mortgage loans. The bank makes commercial loans of all types and sizes including commercial/industrial, commercial mortgage, business credit cards, and construction/land development loans.

Refer to the Market Profiles for the State of Texas in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## **Scope of Evaluation in Texas**

Whitney has one AA in the state of Texas. Therefore, the Houston AA was selected for full-scope review, and the bank's rating in Texas is based on this AA, because this is the only area where Whitney has branches in the state.

The bank's overall rating is based primarily on those areas that received full-scope reviews. Small business lending was given the greatest weight under the Lending Test since it is the bank's primary business line, followed by home mortgage loans. We gave more weight to home improvement and home purchase loans, since the bank's originations for these products represent a higher proportion of total home mortgage loans than refinance loans. The bank's CRA rating is based on performance in the Houston AA since there are no other AAs in the state.

We assessed CRA performance for the entire evaluation period, and also for two time periods: January 1, 1996 through December 31, 1998 and January 1, 1999 through December 31, 2002. We separated the bank's performance for these time periods so Whitney's CRA performance could be compared to other institutions that have received a CRA performance evaluation for a 3 to 4 year evaluation period. The entire evaluation period was considered when deriving the bank's final CRA rating. Since Whitney entered the Houston market in February 2000, we placed more emphasis on its performance from this date forward.

The geographic and borrower distribution of multi-family loans and of small loans to farms are not relevant due to the small volume of loans originated or purchased during the evaluation period. Therefore, an analysis of this information has been eliminated from the Public Evaluation.

## **LENDING TEST**

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

The bank's performance under the lending test in the state of Texas is rated "Outstanding". The bank's performance in the Houston AA, which received a full-scope review, is excellent.

Whitney's rating was based primarily on its overall good geographic and borrower distribution, which was enhanced by excellent community development lending targeted towards redevelopment.

### **Lending Activity**

Refer to Table 1 Lending Volume in the State of Texas section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Whitney's lending activity demonstrates good responsiveness to the credit needs of its AA considering its size, resources, deposit market share, and primary business focus. Whitney's deposit market share of .71% (\$430 million) ranks 17<sup>th</sup> among 205 financial institutions.

In the Houston AA, approximately 80% of the number and 83% of the dollar amount of Whitney's reported loans were small loans to businesses. Approximately 20% of the number and 16% of the dollar amount were home-related loans. Among the home mortgage loans originated in the AA, approximately 44% were for home improvement, 19% for refinance, and 36% were for home purchase.

Whitney's market share rank for small loans to businesses and home improvement loans compares well to their deposit market share rank. Whitney ranks 17<sup>th</sup> in both home improvement lending and small loans to businesses with a market share of .80% and .82%, respectively. Whitney ranks 102<sup>nd</sup> with a .13% market share in total HMDA purpose lending originations (home purchase, home improvement, and refinance). Overall lending volume is considered good given the large number of non-bank financial institutions making both home mortgages and small loans to businesses in the Houston AA.

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

Whitney's geographic distribution of lending is good. The geographic distribution of home mortgage loans is good and the geographic distribution of small loans to businesses is good.

Refer to Tables 2 - 6 in the State of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan origination and purchases in the Houston AA.

### ***Home Mortgage Loans and Small Loans to Businesses***

Refer to the following table for conclusions reached on the bank's geographic distribution of home mortgage loan originations for home purchase, home improvement, and refinance products. The analysis focuses separately on low-and moderate-income geographies, and performance is considered good to excellent, depending on the market profile (see Appendix C), if the percentage of loans originated and purchased in

those geographies is near to or exceeds the percentage of owner-occupied housing units in those geographies. The other measure of performance is the comparison of the bank’s overall market share of home purchase loans originated and purchased in the AA to the bank’s market share of home purchase loans in each income level of geography in that AA. The bank’s performance within an AA is considered good to excellent, depending on the bank’s market profile (See Appendix C), if its market share in low- and moderate-income geographies substantially meets or exceeds its overall market share.

Also, refer to the following table for conclusions reached on the bank’s geographic distribution of small loans to business originations. The analysis focuses separately on low-and moderate-income geographies, and performance is considered good to excellent, depending on the bank’s market profile (see Appendix C), if the percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in those geographies is near to or exceeds the percentage of businesses located in those geographies. The other measure of performance is the comparison of the bank’s overall market share of small loans to businesses in the AA to the bank’s market share of small loans to businesses in each income level of geography in that AA. The bank’s performance within an AA is considered good to excellent, depending on the bank’s market profile (see Appendix C), if its market share in low- and moderate-income geographies substantially meets or exceeds its overall market share.

Whitney entered the Houston market in 2000, therefore the bank’s performance in the Houston AA is based on lending data from 2000 through December 31, 2002. The following table displays our conclusions for geographic distribution by each reportable loan product for low and moderate-income census tracts.

Product	Geographic Distribution 1996-1999			Geographic Distribution 2000-2002		
	Low	Mod	Overall	Low	Mod	Overall
Home Purchase	NA	NA	NA	E	A	Good
Home Improvement	NA	NA	NA	E	E	Excellent
Refinance	NA	NA	NA	G	E	Good
Small Business	NA	NA	NA	G	G	Good
Overall Lending	NA	NA	NA	G	G	Good
<b>Overall Conclusion (96-02)</b>						<b>GOOD</b>

A – Adequate, E – Excellent, G – Good, P – Poor, VP – Very Poor, NA – Not Applicable, Mod - Moderate

**Lending Gap Analysis**

Reports and maps detailing Whitney's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained gaps were identified.

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

A substantial majority of Whitney's home mortgage and small loans to businesses were originated and purchased within its AA. By product, the bank originated the following percentages of loans inside its AA in Texas.

<b>Loan Type</b>	<b>% Inside</b>
Home Purchase	76
Refinance	73
Home Improvement	89
Small Loans to Businesses	82
<b>Overall</b>	<b>82</b>

This performance was positively factored in the overall analysis of the geographic distribution of lending.

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

Whitney's distribution of loans to borrowers of different income levels is adequate. The distribution of loans to businesses of different sizes is good. The bank achieved adequate penetration to LMI borrowers with its home mortgage lending. Penetration to businesses with revenues of \$1 million or less is good. Refer to Tables 8 – 11 in the State of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution for the bank's loan originations and purchases in the Houston AA.

### ***Home Mortgage Loans and Small Loans to Businesses***

Refer to the following table for conclusions reached on the bank's borrower distribution of home mortgage loan originations for home purchase, home improvement, and refinance products. The analysis focuses on performance in lending to low- and moderate-income borrowers. Performance in lending to low-income borrowers can be considered good to excellent even though the percentage of loans originated and purchased to such borrowers is lower than the percentage of low-income families in the AA. This guideline recognizes the barriers that lenders may face in originating home purchase loans to low-income borrowers. Performance in lending to moderate-income borrowers is considered good to excellent, depending on the bank's market profile (See Appendix C), if the percentage of loans originated and purchased to moderate-income borrowers is near to or exceeds the percentage of moderate-income families in the AA. The other measure of performance for borrower distribution is a comparison of the bank's market share of home purchase loans originated and purchased in an AA to the bank's market share of home purchase loans to each income level of borrower in that AA. The bank's performance within an AA is considered good to excellent, depending on the bank's market profile (See Appendix C), if its market share to low- and moderate-income borrowers substantially meets or exceeds its overall market share.

Also, refer to the following table for conclusions reached on the bank's performance in making loans to businesses of different sizes. The data provided to analyze the bank's

performance under this criterion include the percentage of businesses within the AA that have revenues of \$1 million or less (demographic data) and the percentage of reported small loans to businesses that were originated and purchased to businesses with revenues of \$1 million or less. The percentage of bank lending that went to small businesses compared to the percentage of businesses within the AA that have revenues of \$1 million or less provides an indication of the bank’s performance relative to the need within the community. Performance that substantially meets or exceeds the performance reflected by the demographic data is considered good to excellent. The other measure of performance is a comparison of the bank’s market share of small loans to businesses with annual revenues of \$1 million or less to the bank’s overall market share in making small loans to businesses. Performance is considered good to excellent, based on the bank’s market profile (See Appendix C), if the bank’s market share of loans to small businesses substantially meets or exceeds the bank’s overall market share.

The following table shows our conclusions by each reportable loan product for borrower distribution and small loans to businesses of different sizes. Specifically, the table shows conclusions reached for lending distribution to low- and moderate-income borrowers and to small businesses with revenues equal to or less than \$1 million. The table shows the bank’s performance since entering the Houston market in 2000.

Product	Borrower Distribution 1996-1999				Borrower Distribution 2000-2002			
	Low	Mod	<\$1mm	Overall	Low	Mod	<\$1mm	Overall
Home Purchase	NA	NA	NA	NA	A	A	NA	Adequate
Home Improvement	NA	NA	NA	NA	E	G	NA	Excellent
Refinance	NA	NA	NA	NA	G	A	NA	Adequate
Small Business	NA	NA	NA	NA	NA	NA	G	Good
Overall Lending	NA	NA	NA	NA	G	A	G	Good
<b>Overall Conclusion (96-02)</b>								<b>GOOD</b>

A – Adequate, E – Excellent, G – Good, P – Poor, VP – Very Poor, NA – Not Applicable, Mod - Moderate

### Community Development Lending

Refer to Table 1 Lending Volume in the State of Texas section of appendix D for the facts and data used to evaluate the bank’s level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending had a positive impact on Lending Test conclusions. Whitney’s level of CD lending is excellent and enhances its overall good level of lending in the Houston AA. During the evaluation period, Whitney made 31 CD loans totaling \$55 million



representing 125% of the bank's total Tier One capital allocated to this market as of December 31, 2002.

Bank management and community contacts identified affordable housing and technical assistance as pressing needs in the Houston AA. Whitney demonstrated an excellent level of responsiveness to the need for affordable housing through the extension of construction financing to builders who specialize in development and rehabilitation of affordable single-family residences and multi-family dwellings. For example, the Whitney CDC made 12 loans totaling \$1.2 million to builders and non-profit entities to construct or rehabilitate 15 affordable 1-4 family residences. Other significant CD loans include a loan to construct the Tejano Community Center which provides a variety of financial, educational and social services to low- and moderate-income minorities, and participation in a \$51 million commercial rehabilitation project located in a low-income census tract within a City-designated Tax Increment Redevelopment Zone.

Other projects support non-profit providers of community services targeted to low- and moderate-income individuals and families. Re-Ward Third Ward, Serve Houston, and Big Brothers and Big Sisters of Greater Houston are some of the bank's CD loan customers.

### **Product Innovation and Flexibility**

The bank offers residential loan programs that benefit low- and moderate-income individuals and geographies. However, due to low volume, the use of flexible and innovative loan products does not materially enhance the bank's performance under the lending test for the State of Texas.

#### Whitney Neighborhood Housing Program

This program is designed to assist low- and moderate-income buyers who cannot qualify for traditional financing. Flexible characteristics of the product include no origination fee or discount points, no reserve requirements, and flexible underwriting criteria such as expanded debt to income ratios, 97% financing, terms up to 30 years, acceptance of nontraditional credit references, one year employment requirement, and one year credit history requirement. Due to the flexible underwriting characteristics, Whitney retains these loans in its loan portfolio. Whitney originated 2 loans totaling \$153 thousand in the state of Texas during the evaluation period.

#### Community Development Consumer Loans

This loan program provides accessible and affordable financing to those low- to moderate-income applicants who do not meet traditional underwriting guidelines. This program contains flexible terms and underwriting guidelines such as an expanded debt to income ratio, one year employment requirement, nontraditional credit references considered, loan amounts up to \$5,000, unsecured, and terms up to 48 months. Loan volume in this product over this CRA evaluation period is unknown.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test in Texas is rated "Outstanding". Based on full-scope review, the bank's performance in the Houston MA is excellent. Refer to Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose community development, as defined in the CRA regulation. Whitney has some complex and innovative investments, and all are beneficial to and meet identified needs in the Houston AA. Two investments totaling \$3.5 million and 31 grants and donations amounting to \$162 thousand had community development purposes, 85% of which were made since 1999. An additional allocation of bank-wide investments of nearly \$500 thousand is attributed to Houston based on the portion of bank deposits from Houston (8%). The combined total represents 9.4% of the bank's Tier 1 Capital allocated to Texas as of December 31, 2003, based on the Texas deposit percentage. The only qualified investment from the prior evaluation period is the amount capitalizing the Whitney CDC.

In addition to the activities of the Whitney CDC and Jefferson Capital Partnership, described in detail in the Louisiana Investment Test section of this evaluation, the bank has invested \$3 million in the SunAmerica Affordable Housing Partners fund. This fund has financed the rehabilitation of 368 affordable housing units in Houston.

## **SERVICE TEST**

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

The bank's performance under the Service Test in Texas is rated "Outstanding". Based on the full-scope review of data for the Houston AA, the bank's performance is excellent.

### **Retail Banking Services**

Refer to Table 15 in the state of Texas section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The dispersion of branches throughout the AA and accessibility to products and services is excellent. Whitney's branches are readily accessible to all geographies and individuals of different income levels throughout the Houston AA. Whitney operates nine branches in Houston. The percentage of branches in low-income tracts exceeds the percentage of population residing in those tracts. The percentage of branches located in moderate-income tracts is higher than the percentage of population residing

in those tracts.

Whitney's record of opening and closing branches has had no impact on the accessibility of delivery systems in the Houston AA. One branch was opened in a middle-income tract, and none closed during the evaluation period.

Whitney operates a total of 13 ATMs throughout the Houston AA. Two ATMs are located in low-income CTs, and five others are located in moderate-income CTs. One of the ATM machines located in a low-income geography accepts deposits. All of the ATMs in the Houston AA show bilingual screens.

All external ATMs are available 24-hours a day, seven days a week. However, a few ATMs are located inside office buildings and are subject to the hours of operation of the building in which they are located, but are available for 12 or more hours per day.

Bank hours, services, and products offered do not vary in a way that inconveniences any portions of the assessment area, including low- and moderate-income geographies and individuals. Banking hours are consistent throughout the AA. Hours are 8AM or 9AM to 3PM or 4PM Monday through Friday. Suburban branch lobbies are generally open on Saturday mornings. Drive-up facilities have extended hours, from 7AM or 7:30 AM to 3PM or 4PM, with extended hours on Fridays and Saturdays. Automated services, including telephone menus and ATMs, are available in Spanish.

A variety of deposit and loan products, and business services, are available at all Whitney branch locations. Several deposit products are responsive to the needs of low- or moderate-income individuals and small businesses. Products of relevance to this evaluation, offered in all AAs, are described under the Service Test for the State of Louisiana. These products are targeted to low- and moderate-income individuals or small businesses, and provide basic low cost banking products throughout the AA.

## **Community Development Services**

Whitney provides a good level of community development services in the Houston AA that had a positive impact on the state Service Test rating assigned to the bank. The bank participates in, and often underwrites expenses for, affordable housing fairs, homebuyer training targeting low- to moderate-income families, and small business development forums. In addition, bank Community Affairs personnel assisted a variety of housing development groups in completing applications for affordable housing grants from the Federal Home Loan Bank of Dallas in 2001 and 2002. Two applications totaling \$90 thousand in Houston were approved. The grants helped subsidize closing costs and downpayments for first-time low-income homebuyers, and subsidize the construction of eight transitional low-income rental units.

## State of Mississippi

<b>CRA Rating for Mississippi</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>Low Satisfactory</b>
<b>The investment test is rated:</b>	<b>Outstanding</b>
<b>The Service Test is rated:</b>	<b>Outstanding</b>

The major factors that support this rating include:

- Whitney's overall CRA reportable loan volume in Mississippi is adequate.
- Whitney's overall geographic distribution is good.
- The bank's overall lending to borrowers of different incomes and businesses of different sizes is adequate.
- The bank originated an adequate level of CD loans in Mississippi. These loans had a neutral impact on the Lending Test rating in Mississippi.
- The level of qualified investments in Mississippi is excellent.
- Service delivery systems are readily accessible to all geographies and individuals of different income levels in the Mississippi AA.
- Community development services support the bank's other community development efforts and address identified needs in the community. These services had a positive impact on the Service Test rating.

## Description of Institution's Operations in Mississippi

Whitney has one assessment area (AA) in the state of Mississippi. Therefore, the Gulfport AA was selected for full-scope review because this is the only area where Whitney has branches in the state. The bank operates eight branches and 15 ATMs in the Gulfport AA, which accounts for 3.7% of bank deposits and 3% of reportable loans.

Whitney has a deposit market share of .62% and ranks 28th out of a total of 245 deposit taking institutions in the state of Mississippi. State banking competition is aggressive and includes dominant affiliates of large national banking companies, several midsize banks, numerous community banks, credit unions, and non-bank financial service providers. The top five competitors in this market include: Trustmark National Bank, Union Planters National Bank, Bancorp South, Amsouth Bank, and Hancock Bank, all of which compete with Whitney in the Gulfport AA.

The bank's CRA reportable loans are comprised of 68% HMDA reportable loans and 31% small loans to businesses. This loan breakdown is different from the other markets

that are primarily made up of small loans to businesses. Home mortgage products include home purchase, refinance, and home improvement loans. The bank makes commercial loans of all types and sizes including commercial/industrial, commercial mortgage, business credit cards, and construction/land development loans.

Refer to the Market Profiles for the State of Mississippi in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## **Scope of Evaluation in Mississippi**

Whitney has one AA in the state of Mississippi. Therefore, a full-scope review of the Gulfport AA was performed, and the state rating is based on the bank's performance in the Gulfport AA, because this is the only area where Whitney has branches in the state. Refer to the table in Appendix A for more information on the scope of the evaluation.

The bank's overall rating is based primarily on those areas that received full-scope reviews. Home mortgage lending was given the greatest weight under the lending test since it accounts for the greatest portion of CRA reportable loans, followed by small loans to businesses. We gave more weight to home improvement and refinance lending, since the bank's originations for these products represent a higher proportion of total home mortgage loans than home purchase loans.

We assessed CRA performance for the entire evaluation period, and also for two time periods: January 1, 1996 through December 31, 1998 and January 1, 1999 through December 31, 2002. We separated the bank's performance for these time periods so Whitney's CRA performance could be compared to other institutions that have received a CRA performance evaluation for a 3 to 4 year evaluation period. We gave slightly more weight to the bank's performance under the most recent 4-year evaluation period (January 1, 1999 through December 31, 2002) than the former 3-year period. The entire evaluation period was considered when deriving the bank's final CRA rating.

The geographic distribution of multi-family loans and the geographic and borrower distribution of small loans to farms are not relevant due to the small volume of loans originated or purchased during the evaluation period. Therefore, an analysis of the geographic distribution of multi-family loans and the geographic and borrower distribution of small loans to farms has been eliminated from the Public Evaluation.

## **LENDING TEST**

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

The bank's performance under the lending test is rated "Low Satisfactory". Based on the bank's performance in the Gulfport AA, which received a full-scope review, the bank's performance is adequate.

### **Lending Activity**

Refer to Table 1 Lending Volume in the State of Mississippi section of appendix D for the facts and data used to evaluate the bank's lending activity.

Whitney's lending activity demonstrates adequate responsiveness to the credit needs of its AA considering its size, resources, and primary business focus. Whitney's deposit market share of 7.53% (\$198 million) ranks fourth among fourteen financial institutions.

In the Gulfport MA, approximately 68% of the number and 63% of the dollar amount of Whitney's reported loans were home mortgage loans. Approximately 31% of the number and 34% of the dollar amount were small loans to businesses. Among the home mortgage loans originated in the AA, approximately 27% were for home purchase, 35% were for home improvement, and 38% were for refinance.

Overall CRA reportable loan volume is adequate in the Gulfport AA. Whitney's market share rank for HMDA purpose and small loans to businesses is lower than its deposit market share rank. For example, Whitney ranks number 12 in home mortgage lending and number 11 in small loans to businesses with a market share of 2.55% and 1.69%, respectively. Whitney ranks number three in home improvement loan volume with a 5.8% market share. Overall lending volume is considered adequate given the large number of non-bank financial institutions making both home mortgages and small loans to businesses in the Gulfport AA.

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

Whitney's geographic distribution of lending is good. The geographic distribution of home mortgage and small loans to businesses is good.

Refer to Tables 2 - 6 in the state of Mississippi section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases in the Gulfport AA.

### ***Home Mortgage Loans and Small Loans to Businesses***

Refer to the following table for conclusions reached on the bank's geographic distribution of home mortgage loan originations for home purchase, home improvement, and refinance products. The analysis focuses separately on low-and moderate-income geographies, and performance is considered good to excellent, depending on the market profile (see Appendix C), if the percentage of loans originated and purchased in those geographies is near to or exceeds the percentage of owner-occupied housing units in those geographies. The other measure of performance is the comparison of the bank's overall market share of home purchase loans originated and purchased in the AA to the bank's market share of home purchase loans in each income level of geography in that AA. The bank's performance within an AA is considered good to excellent, depending on the bank's market profile (See Appendix C), if its market share in low- and moderate-income geographies substantially meets or exceeds its overall market share.

Also, refer to the following table for conclusions reached on the bank’s geographic distribution of small loans to business originations. The analysis focuses separately on low-and moderate-income geographies, and performance is considered good to excellent, depending on the bank’s market profile (see Appendix C), if the percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in those geographies is near to or exceeds the percentage of businesses located in those geographies. The other measure of performance is the comparison of the bank’s overall market share of small loans to businesses in the AA to the bank’s market share of small loans to businesses in each income level of geography in that AA. The bank’s performance within an AA is considered good to excellent, depending on the bank’s market profile (see Appendix C), if its market share in low- and moderate-income geographies substantially meets or exceeds its overall market share.

The Gulfport AA contains two low-income census tracts. These two census tracts only account for 1.28% of the housing units in the AA. Whitney’s main branch location is located in one of these census tracts; however, this tract does not contain any owner-occupied housing units. The other low-income census tract contains an airport and serves primarily commercial businesses. This census tract only has a median income of 18.1% of the MSA median income and a 39% owner-occupancy rate. This census tract is not located near any of Whitney’s branches and is served by other near by financial institutions. Due to these reasons, we did not give any weight to the bank’s HMDA lending performance in low-income census tracts.

We gave weight to both performance evaluation methods (demographic and market share) when deriving conclusions for the geographic distribution of small loans to businesses and home mortgage loans. We placed less emphasis on the market share data analysis during the earlier part of the evaluation period (1996 – 1998) since 2001 market share data is not relevant to this time period. We gave equal weight to market share data during the latter part of the evaluation period (1999 – 2002).

The following table displays our conclusions for geographic distribution by each reportable loan product for low and moderate-income census tracts. The table shows the bank’s performance during the January 1, 1996 through December 31, 1998 and January 1, 1999 through December 31, 2002 time periods.

Product	Geographic Distribution 1996-1998			Geographic Distribution 1999-2002		
	Low	Mod	Overall	Low	Mod	Overall
Home Purchase	NA	P	Poor	NA	G	Adequate
Home Improvement	NA	E	Excellent	NA	E	Excellent
Refinance	NA	A	Adequate	NA	E	Excellent
Small Business	E	A	Good	G	E	Excellent
Overall Lending	E	A	Good	G	E	Excellent
<b>Overall Conclusion (96-02)</b>						<b>GOOD</b>

A – Adequate, E – Excellent, G – Good, P – Poor, VP – Very Poor, NA – Not Applicable

***Lending Gap Analysis***

Reports and maps detailing Whitney's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained gaps were identified.

***Inside/Outside Ratio***

A substantial majority of Whitney’s home mortgage loans and small loans to businesses were originated/purchased within its AA. By product, the bank originated the following percentages of loans inside the Gulfport AA.

<b>Loan Type</b>	<b>% Inside</b>
Home Purchase	84
Refinance	88
Home Improvement	90
Small Loans to Businesses	80
<b>Overall</b>	<b>85</b>

This performance was positively factored in the overall analysis of the geographic distribution of lending.

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

Whitney’s distribution of mortgage loans to borrowers of different income levels is adequate. The distribution of loans to businesses of different sizes is good. The bank achieved adequate penetration to LMI borrowers with its home mortgage lending. Penetration to businesses with revenues of \$1 million or less is good.

Refer to Tables 8 – 11 in the State of Mississippi section of Appendix D for the facts and data used to evaluate the borrower distribution for the bank’s loan originations and purchases in the Gulfport AA.

***Home Mortgage Loans and Small Loans to Businesses***

Refer to the following table for conclusions reached on the bank’s borrower distribution of home mortgage loan originations for home purchase, home improvement, and refinance products. The analysis focuses on performance in lending to low- and moderate-income borrowers. Performance in lending to low-income borrowers can be considered good to excellent even though the percentage of loans originated and purchased to such borrowers is lower than the percentage of low-income families in the AA. This guideline recognizes the barriers that lenders may face in originating home purchase loans to low-income borrowers. Performance in lending to moderate-income borrowers is considered good to excellent, depending on the bank’s market profile (See



Appendix C), if the percentage of loans originated and purchased to moderate-income borrowers is near to or exceeds the percentage of moderate-income families in the AA. The other measure of performance for borrower distribution is a comparison of the bank's market share of home purchase loans originated and purchased in an AA to the bank's market share of home purchase loans to each income level of borrower in that AA. The bank's performance within an AA is considered good to excellent, depending on the bank's market profile (See Appendix C), if its market share to low- and moderate-income borrowers substantially meets or exceeds its overall market share.

Also, refer to the following table for conclusions reached on the bank's performance in making loans to businesses of different sizes. The data provided to analyze the bank's performance under this criterion include the percentage of businesses within the AA that have revenues of \$1 million or less (demographic data) and the percentage of reported small loans to businesses that were originated and purchased to businesses with revenues of \$1 million or less. The percentage of bank lending that went to small businesses compared to the percentage of businesses within the AA that have revenues of \$1 million or less provides an indication of the bank's performance relative to the need within the community. Performance that substantially meets or exceeds the performance reflected by the demographic data is considered good to excellent. The other measure of performance is a comparison of the bank's market share of small loans to businesses with annual revenues of \$1 million or less to the bank's overall market share in making small loans to businesses. Performance is considered good to excellent, based on the bank's market profile (See Appendix C), if the bank's market share of loans to small businesses substantially meets or exceeds the bank's overall market share.

We equally weighted the two performance measurements (demographic data and market share) to derive an overall conclusion as to the bank's performance in making loans to businesses of different sizes and borrowers of different incomes during the 1999 through 2002 portion of the evaluation period. We placed more emphasis on the demographic performance measurement analysis during the 1996 through 1998 portion of the evaluation period and less emphasis on market share data since 2001 market share data is not relevant to this time period.

The following table shows our conclusions by each reportable loan product for borrower distribution and small loans to businesses of different sizes. Specifically, the table shows conclusions reached for lending distribution to low- and moderate-income borrowers and to small businesses with revenues equal to or less than \$1 million. The table shows the bank's performance during the January 1, 1996 through December 31, 1998 and January 1, 1999 through December 31, 2002 time periods.

Product	Borrower Distribution 1996-1998				Borrower Distribution 1999-2002			
	Low	Mod	<\$1mm	Overall	Low	Mod	<\$1mm	Overall
Home Purchase	P	A	NA	Adequate	P	A	NA	Adequate
Home Improvement	P	E	NA	Good	A	A	NA	Adequate
Refinance	VP	P	NA	Poor	A	A	NA	Adequate

Small Business	NA	NA	A	Adequate	NA	NA	G	Good
Overall Lending	VP	A	A	Adequate	A	A	G	Adequate
Overall Conclusion (96-02)								<b>ADEQUATE</b>

A – Adequate, E – Excellent, G – Good, P – Poor, VP – Very Poor, NA – Not Applicable

### Community Development Lending

Refer to Table 1 Lending Volume in the State of Mississippi section of Appendix D for the facts and data used to evaluate the bank’s level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Whitney originated eight CD loans totaling \$708 thousand during the evaluation period, all related to affordable housing and all since 1999. This amount represents 3.5% of Tier One Capital allocated to Mississippi based on the percentage of bank deposits attributable to this AA. CD lending in the Gulfport AA had a neutral impact on the Lending Test rating in Mississippi.

### Product Innovation and Flexibility

Whitney’s use of innovative and flexible loan products does not materially enhance the bank’s performance under the lending test in the state of Mississippi. The bank offers residential loan programs that benefit low- and moderate-income individuals and geographies, but volume is considered low.

#### Whitney Neighborhood Housing Program

This program is designed to assist low- and moderate-income buyers who cannot qualify for traditional financing. Flexible characteristics of this product include no origination fee or discount points, no reserve requirements, and flexible underwriting criteria such as expanded debt to income ratios, 97% financing, terms up to 30 years, acceptance of nontraditional credit references, one year employment requirement, and one year credit history requirement. Due to the flexible underwriting characteristics, Whitney retains these loans in its loan portfolio. Whitney originated 2 loans totaling \$89 thousand in the state of Mississippi between January 1, 1999 and December 31, 2002, and 3 loans totaling approximately \$131 thousand from January 1, 1996 through December 31, 1998.

#### Community Development Consumer Loans

This loan program provides accessible and affordable financing to those low to moderate income applicants who do not meet traditional underwriting guidelines. This program contains flexible terms and underwriting guidelines such as an expanded debt to income ratio, one year employment requirement, consideration of nontraditional credit references, loan amounts up to \$5,000, no collateral requirements, and terms up to 48 months. Loan volume in this product over this CRA evaluation period is unknown.

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

There are no areas that received a limited-scope review in the state of Mississippi.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test in Mississippi is rated "Outstanding". Based on a full-scope review, the bank's performance in the Gulfport AA is excellent. Refer to Table 14 in the State of Mississippi section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Qualifying investments are investments, deposits, membership shares or grants that have as their primary purpose community development, as defined in the CRA regulation. Whitney has some complex and innovative investments, and all are beneficial to and meet identified needs in the Gulfport AA. Two investments totaling \$1.2 million were made since 1999 in the Guilford Capital Fund backed by low income housing tax credits. The tax credits are related to affordable multi-family housing complexes. The bank also made 38 qualifying grants and donations amounting to \$25 thousand. An additional allocation of bank-wide investments of \$220 thousand is attributed to Gulfport based on the portion of bank deposits from this AA (3.7%). The combined total represents 7% of the bank's Tier One Capital allocated to the Gulfport AA as of December 31, 2003, based on the AA's deposit percentage.

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

There are no areas that received a limited-scope review in the state of Mississippi.

## **SERVICE TEST**

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

The bank's performance under the Service Test in Mississippi is rated "Outstanding". Based on our full-scope review, the bank's performance in the Gulfport AA is excellent.

### **Retail Banking Services**

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

Whitney's delivery systems are readily accessible to all geographies and individuals of different income levels throughout the Gulfport AA. There are eight Whitney branches

in the Gulfport AA, all of which are full service branches. The percentage of branches in low-income tracts is higher than the percentage of population residing in those tracts. The percentage of branches located in moderate-income tracts is higher than the percentage of population residing in those tracts.

Whitney's record of opening and closing branches has had no impact on the accessibility of delivery systems in the Gulfport AA. One branch was closed in a moderate-income geography in 1997, and two in middle-income geographies in 2000 and 2002. No branches have been opened in the Gulfport AA during the review period. The bank continues to operate a full-service branch and 24-hour ATM proximate to the branch closed.

Whitney operates a total of 15 ATMs throughout the Gulfport AA, which operate 24 hours a day, seven days a week. One ATM is located in a low-income CT, and four others are located in moderate-income CTs. Seven of the ATMs are stand alone, three of which are in moderate-income geographies and four are in middle-income geographies. All ATMs associated with branches are deposit-taking ATMs, including one located in a low-income geography and one in a moderate-income geography.

Whitney's hours, services, and products offered do not vary in a way that inconveniences any portions of the assessment area, including low- and moderate-income geographies and individuals. Banking hours are consistent throughout the AA. Lobby and drive-up hours are 9AM to 4PM Monday through Thursday, extended to 5:30 PM on Friday. Three branches are open on Saturdays from 9AM to Noon.

A variety of deposit and loan products, and business services, are available at all Whitney branch locations. In addition to the products and services normally offered by a bank of Whitney's size and complexity, several deposit products are responsive to the needs of low- or moderate-income individuals and small businesses. Products of relevance to this evaluation are described under the Service Test for the State of Louisiana. These products are not only targeted to low- and moderate-income individuals or small businesses, but provide basic low cost banking products throughout the AA.

### **Community Development Services**

Whitney provides a good level of CD services in the Gulfport AA, centered in affordable housing and economic development related to the revitalization and stabilization of targeted areas in the AA. This level of CD services had a positive impact on the Service Test rating. Services include instruction at affordable housing fairs, consulting with community development groups to create and sustain affordable housing programs, and providing expertise in finance and lending to economic development groups.

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

There are no areas that received a limited-scope review in the state of Mississippi.

## State of Alabama

<b>CRA Rating for Alabama:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>High Satisfactory</b>
<b>The investment test is rated:</b>	<b>High Satisfactory</b>
<b>The Service Test is rated:</b>	<b>High Satisfactory</b>

The major factors that support this rating include:

- Whitney demonstrated good responsiveness to credit needs within the Mobile AA. Whitney's lending activity for small loans to businesses and home improvement loans is particularly strong.
- Whitney's overall geographic distribution of lending is good.
- Whitney's distribution of lending to borrowers of different incomes and businesses of different sizes is adequate.
- The bank originated an excellent level of community development loans during the review period, which had a positive impact on the Lending Test rating.
- The use of innovative and flexible loan products enhances the bank's performance under the lending test.
- The level of qualified investments in Alabama is good.
- Service delivery systems are accessible to essentially all geographies and individuals of different income levels in the Alabama AAs.
- The bank provides an excellent level of CD services that supports the bank's other community development efforts and addresses identified needs in the community. These services had a positive impact on the Service Test rating.

## Description of Institution's Operations in Alabama

Whitney operates 18 branches and 18 ATMs within three AAs in the state of Alabama. The Alabama AAs include two metropolitan areas: Mobile and Montgomery; and the non-metropolitan area of Greenville. Approximately 8.4% of the bank's total deposits were attributed to these AAs. In addition, the bank originated approximately 9.8% by number, and 11.1% by dollar volume, of its total reported loans in these AAs.

The Mobile AA represents 56% of the branch network, 46% of the deposit base, and 78% of reported loan originations for this evaluation period. The Montgomery AA is the next largest market and represents 28% of the branch network, 33% of the deposit base, and 18% of reported loan originations for this evaluation period. The Greenville AA represents 17% of the branch network, 20% of the deposit base, and 4% of reported loan originations for this evaluation period in the State of Alabama.

Whitney's deposit market share rank in the State of Alabama is 17<sup>th</sup> with a market share of .74% out of a total of 599 lending institutions, which accept deposits. State banking competition is aggressive and includes dominant affiliates of large national banking companies, midsize banks, and numerous small community banks, credit unions, and non-bank financial service providers. The top five competitors in this market include: Regions Bank, Southtrust Bank, Colonial Bank, Amsouth Bank, and Compass Bank all of which compete directly with Whitney within its various Alabama markets.

Traditionally, Whitney has been a prominent commercial lender in its various Alabama markets. The bank makes commercial loans of all types and sizes including commercial/industrial, commercial mortgage, business credit cards, and construction/land development loans. Whitney also originates HMDA and retail purpose loans in the state. Examples of loans to retail customers include residential mortgages of all types, residential construction loans, personal loans (including lines of credit), and auto loans.

Refer to the Market Profiles for the State of Alabama in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## **Scope of Evaluation in Alabama**

We evaluated the bank's performance in the State of Alabama by performing a full-scope review of the Mobile AA and limited scope reviews of the Montgomery AA and the Greenville non-metropolitan AA. We selected the Mobile AA for a full-scope review because the bank maintains a substantial share of its business in Alabama within this AA: approximately 46% of the deposits and 78% of reportable loan originations in the state during the evaluation period. Additionally, the Mobile AA is where the highest concentration of branches in Alabama is located. Please refer to the table in Appendix A for more information.

The bank's overall rating is based primarily on the area that received a full-scope review. Small business lending performance was given the greatest weight under the lending test since it is the bank's primary business line, followed by home mortgage loans. We gave more weight to refinance and home purchase lending, since the bank's originations for these products represent a higher proportion of total home mortgage loans than home improvement loans.

We assessed CRA performance for the entire evaluation period, and also for two time periods: January 1, 1996 through December 31, 1998 and January 1, 1999 through December 31, 2002. We separated the bank's performance for these time periods so Whitney's CRA performance could be compared to other institutions that have received a CRA performance evaluation for a 3 to 4 year evaluation period. We gave slightly more weight to the bank's performance under the most recent 4-year evaluation period (January 1, 1999 through December 31, 2002) than the former 3-year period. The entire evaluation period was considered when deriving the bank's final CRA rating.

The geographic distribution of multi-family loans and the geographic and borrower distribution of small loans to farms are not relevant due to the small volume of loans originated or purchased during the evaluation period. Therefore, an analysis of the geographic distribution of multi-family loans and the geographic and borrower distribution of small loans to farms has been eliminated from the Public Evaluation.

## **LENDING TEST**

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

The bank's performance under the lending test in the State of Alabama is rated "High Satisfactory". Based primarily on the bank's performance in the Mobile AA that received a full-scope review, the bank's performance is good.

### **Lending Activity**

Refer to Table 1 Lending Volume in the State of Alabama section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Whitney's lending activity demonstrates good responsiveness to the credit needs of its AA considering its size, resources, and primary business focus. Whitney's deposit market share of 3.4% (\$208 million) ranks 6<sup>th</sup> among 41 financial institutions.

In the Mobile AA, 65% of the number and 69% of the dollar amount of Whitney's reported loans were small loans to businesses. Home mortgage loans comprise 35% of the number and 29% of the dollar amount of reported loans. Among the home mortgage loans originated in the AA, 34% were for home purchase, 21% were for home improvement, and 45% were for refinance.

Overall reportable loan volume is good in the Mobile AA. In particular, lending activity is strong for home improvement and small loans to businesses. Whitney's CRA reportable loan market share rank compares well to their deposit market share rank. For example, Whitney ranks number four in home improvement lending and number ten in small loans to businesses with a market share of 4.6% and 3.7%, respectively. Whitney's loan volume in other CRA reportable products is not as strong as these two products when compared to its deposit market share. Overall, loan volume is

considered good given the large number of non-bank financial institutions making both home mortgages and small loans to businesses in the Mobile AA.

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

Whitney's geographic distribution of lending is good. The geographic distribution of home mortgage loans is adequate and the geographic distribution of small loans to businesses is excellent.

Refer to Tables 2 - 6 in the State of Alabama section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases in the Mobile AA.

### ***Home Mortgage Loans and Small Loans to Businesses***

Refer to the following table for conclusions reached on the bank's geographic distribution of home mortgage loan originations for home purchase, home improvement, and refinance products. The analysis focuses separately on low-and moderate-income geographies, and performance is considered good to excellent, depending on the market profile (see Appendix C), if the percentage of loans originated and purchased in those geographies is near to or exceeds the percentage of owner-occupied housing units in those geographies. The other measure of performance is the comparison of the bank's overall market share of home purchase loans originated and purchased in the AA to the bank's market share of home purchase loans in each income level of geography in that AA. The bank's performance within an AA is considered good to excellent, depending on the bank's market profile (See Appendix C), if its market share in low- and moderate-income geographies substantially meets or exceeds its overall market share.

Also, refer to the following table for conclusions reached on the bank's geographic distribution of small loans to business originations. The analysis focuses separately on low-and moderate-income geographies, and performance is considered good to excellent, depending on the bank's market profile (see Appendix C), if the percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in those geographies is near to or exceeds the percentage of businesses located in those geographies. The other measure of performance is the comparison of the bank's overall market share of small loans to businesses in the AA to the bank's market share of small loans to businesses in each income level of geography in that AA. The bank's performance within an AA is considered good to excellent, depending on the bank's market profile (see Appendix C), if its market share in low- and moderate-income geographies substantially meets or exceeds its overall market share.

We gave weight to both performance evaluation methods (demographic and market share) when deriving conclusions for the geographic distribution of small loans to businesses and home mortgage loans. We placed less emphasis on the market share data analysis during the earlier part of the evaluation period (1996 – 1998) since 2001



market share data is not relevant to this time period. We gave equal weight to market share data during the latter part of the evaluation period (1999 – 2002).

The following table displays our conclusions for geographic distribution by each reportable loan product for low and moderate-income census tracts. The table shows the bank’s performance during the January 1, 1996 through December 31, 1998 and January 1, 1999 through December 31, 2002 time periods.

Product	Geographic Distribution 1996-1998			Geographic Distribution 1999-2002		
	Low	Mod	Overall	Low	Mod	Overall
Home Purchase	E	P	Good	E	E	Excellent
Home Improvement	VP	P	Poor	A	P	Adequate
Refinance	VP	P	Poor	P	P	Poor
Small Business	E	E	Excellent	E	E	Excellent
Overall Lending	G	G	Good	G	G	Good
<b>Overall Conclusion (96-02)</b>						<b>GOOD</b>

A – Adequate, E – Excellent, G – Good, P – Poor, VP – Very Poor, NA – Not Applicable

***Lending Gap Analysis***

Reports and maps detailing Whitney's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained gaps were identified.

***Inside/Outside Ratio***

This analysis was performed at the state level. A substantial majority of Whitney’s home mortgage loans and small loans to businesses were originated/purchased within its AAs. By product, the bank originated the following percentages of loans inside its AAs in Alabama.

Loan Type	% Inside
Home Purchase	96
Refinance	93
Home Improvement	92
Small Loans to Businesses	96
<b>Overall</b>	<b>95</b>

This performance was positively factored in the overall analysis of the geographic distribution of lending.

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

The distribution of Whitney's CRA reportable loans by income level of the borrower and to small businesses is adequate. Refer to Tables 8 – 11 in the State of Alabama

section of Appendix D for the facts and data used to evaluate the borrower distribution for the bank's loan originations and purchases in the Mobile AA.

### ***Home Mortgage Loans and Small Loans to Businesses***

Refer to the following table for conclusions reached on the bank's borrower distribution of home mortgage loan originations for home purchase, home improvement, and refinance products. The analysis focuses on performance in lending to low- and moderate-income borrowers. Performance in lending to low-income borrowers can be considered good to excellent even though the percentage of loans originated and purchased to such borrowers is lower than the percentage of low-income families in the AA. This guideline recognizes the barriers that lenders may face in originating home purchase loans to low-income borrowers. Performance in lending to moderate-income borrowers is considered good to excellent, depending on the bank's market profile (See Appendix C), if the percentage of loans originated and purchased to moderate-income borrowers is near to or exceeds the percentage of moderate-income families in the AA. The other measure of performance for borrower distribution is a comparison of the bank's market share of home purchase loans originated and purchased in an AA to the bank's market share of home purchase loans to each income level of borrower in that AA. The bank's performance within an AA is considered good to excellent, depending on the bank's market profile (See Appendix C), if its market share to low- and moderate-income borrowers substantially meets or exceeds its overall market share.

Also, refer to the following table for conclusions reached on the bank's performance in making loans to businesses of different sizes. The data provided to analyze the bank's performance under this criterion include the percentage of businesses within the AA that have revenues of \$1 million or less (demographic data) and the percentage of reported small loans to businesses that were originated and purchased to businesses with revenues of \$1 million or less. The percentage of bank lending that went to small businesses compared to the percentage of businesses within the AA that have revenues of \$1 million or less provides an indication of the bank's performance relative to the need within the community. Performance that substantially meets or exceeds the performance reflected by the demographic data is considered good to excellent. The other measure of performance is a comparison of the bank's market share of small loans to businesses with annual revenues of \$1 million or less to the bank's overall market share in making small loans to businesses. Performance is considered good to excellent, based on the bank's market profile (See Appendix C), if the bank's market share of loans to small businesses substantially meets or exceeds the bank's overall market share.

We equally weighted the two performance measurements (demographic data and market share) to derive an overall conclusion as to the bank's performance in making loans to businesses of different sizes and borrowers of different incomes during the 1999 through 2002 portion of the evaluation period. We placed more emphasis on the demographic performance measurement analysis during the 1996 through 1998 portion of the evaluation period since 2001 market share data is not relevant to this time period.

The following table shows our conclusions by each reportable loan product for borrower distribution and small loans to businesses of different sizes. Specifically, the table shows conclusions reached for lending distribution to low- and moderate-income borrowers and to small businesses with revenues equal to or less than \$1 million. The table shows the bank’s performance during the January 1, 1996 through December 31, 1998 and January 1, 1999 through December 31, 2002 time periods.

Product	Borrower Distribution 1996-1998				Borrower Distribution 1999-2002			
	Low	Mod	<\$1mm	Overall	Low	Mod	<\$1mm	Overall
Home Purchase	P	A	NA	Adequate	E	E	NA	Excellent
Home Improvement	P	G	NA	Adequate	P	A	NA	Adequate
Refinance	VP	A	NA	Poor	P	A	NA	Adequate
Small Business	NA	NA	A	Adequate	NA	NA	A	Adequate
Overall Lending	P	A	A	Adequate	A	A	A	Adequate
<b>Overall Conclusion (96-02)</b>								<b>ADEQUATE</b>

A – Adequate, E – Excellent, G – Good, P –Poor, VP – Very Poor, NA – Not Applicable

### Community Development Lending

Refer to Table 1 Lending Volume of Appendix D in the State of Alabama section for the facts and data used to evaluate the bank’s level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending in the Mobile AA is excellent and had a positive impact on the Lending Test rating. Whitney originated 17 CD loans totaling \$9 million, half of which originated since 1999. This represents 42% of the Tier One Capital allocated to the Mobile AA based on its bank deposit percentage. All but one of these loans is related to affordable housing. The bank has made major commitments to the Alabama Multi-family Loan Consortium, a multi-bank loan pool to construct, renovate and maintain affordable multi-family housing throughout the State of Alabama.

### Product Innovation and Flexibility

The use of innovative and flexible loan products enhances the bank’s performance under the Lending Test, and positively impacted the rating. Specifically, the bank offers residential loan programs that benefit low- and moderate-income individuals and geographies.

#### Whitney Neighborhood Housing Program

This program is designed to assist low- and moderate-income buyers who cannot qualify for traditional financing. Flexible characteristics of this product include no origination fee or discount points, no reserve requirements, and flexible underwriting criteria such as expanded debt to income ratios, 97% financing, terms up to 30 years,

acceptance of nontraditional credit references, one year employment requirement, and one year credit history requirement. Due to the flexible underwriting characteristics, Whitney retains these loans in its loan portfolio. Whitney originated 67 loans totaling \$2.9 million in the state of Alabama between January 1, 1999 and December 31, 2002, and 11 loans totaling \$470 thousand from January 1, 1996 to December 31, 1998.

#### Leveraged Loan Program

This program leverages funds with Rural Housing, a division of the U.S. Department of Agriculture. The program targets individuals/families with incomes at 80% or less than the median income. Whitney NB provides a first mortgage of less than 50% loan to value with Rural Housing funding the second mortgage. Whitney's participation reduces the amount the agency must provide which maximizes the use of government funding. This program contains flexible terms and underwriting characteristics such as terms up to 30 years, no cash required from the borrower for the down payment, no origination fee or discount points, expanded debt to income ratios, no private mortgage insurance required, non traditional credit references accepted, reduced credit history requirements, and no reserve requirements. Due to the flexible underwriting characteristics, Whitney retains these loans in its loan portfolio. Whitney originated 33 loans totaling \$659 thousand in the state of Alabama between January 1, 1999 and December 31, 2002.

#### Community Development Consumer Loans

This loan program provides accessible and affordable financing to those low to moderate income applicants who do not meet traditional underwriting guidelines. This program contains flexible terms and underwriting guidelines such as an expanded debt to income ratio, one year employment requirement, nontraditional credit references considered, loan amounts up to \$5,000, unsecured, and terms up to 48 months. Loan volume in this product over this CRA evaluation period is unknown.

#### Prichard Housing Program (Mobile, Alabama)

This is an affordable housing program offered through the Prichard Housing Authority. The program is offered to first time homebuyers who have enrolled in the Prichard Lease Purchase/Educational Training Program, and requires that the client rent the property prior to purchase. The program's philosophy is that this process teaches the client how to be a homeowner and is a good method for the transition from renter to homeowner. Whitney has participated in this program by providing below market rates to Prichard's clients at the time of loan application. The applicant receives a forgivable grant from Prichard Housing Authority in conjunction with Whitney's financing. Typically, the grant is equal to 25% of the purchase price. This loan program includes the same flexible characteristics as the Whitney Neighborhood Housing Program, plus the Whitney loan is leveraged with government grant money so the borrower does not pay for closing costs out of pocket. Also, the program is flexible in that it allows the prospective homeowner to rent the home for up to 3 years before purchasing. Whitney originated 35 loans totaling \$2.3 million in the State of Alabama during the evaluation period.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Montgomery AA and the Greenville AA is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Alabama. The limited scope reviews indicate that there are some areas of performance under the Lending Test that are stronger and weaker than the overall state performance, however, after considering community development lending, the overall Lending Test rating for the areas receiving limited scope reviews is not inconsistent with the overall rating for the state. Refer to the State of Alabama sections of Tables 1 - 12 of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test in Alabama is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Mobile AA is good. Refer to the State of Alabama section of Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

In the Mobile AA, Whitney made qualified CD investments totaling \$610 thousand, or 2.8% of Tier One Capital. Approximately 40% of the investments are centered in low-income housing tax credits, 40% in bank-wide investments including the Whitney CDC, and the remainder in grants and donations to non-profits that provide services to low- and moderate-income persons.

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

Based on limited-scope reviews, the bank's performance in the Montgomery AA is stronger than the bank's overall "High Satisfactory" performance in the state. Whitney made qualified CD investments totaling approximately \$1.9 million in Montgomery, which exceeds 12% of Tier One Capital allocated to this AA based on bank deposits in this market. The bank invested \$1.7 million in low-income housing tax credits related to three projects covering 488 units of affordable housing.

In the Greenville non-metropolitan AA, the bank's performance is weaker than the bank's overall performance in the state. The bank invested \$141 thousand, or 1.52% of Tier One Capital, in Greenville during the review period.

Refer to the State of Alabama section of Table 12 in Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the Service Test in Alabama is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Mobile AA is adequate. The bank's performance in the areas receiving limited scope reviews had a positive impact on the Service Test rating.

## **Retail Banking Services**

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

Whitney's branches are reasonably accessible to essentially all geographies and individuals of different income levels throughout the Mobile AA. Whitney does not have any branches located in low- and moderate-income tracts in the Mobile AA. Whitney operates a total of 10 ATMs throughout the Mobile AA. No ATMs are located in low- and moderate-income geographies. However, bank branch locations are proximate to the low- and moderate-income geographies. For example, the main bank office is across a highway from a large low-income tract, and the Royal Street branch, located in an undesignated CT, is surrounded by a number of the low- and moderate-income geographies in the central city of Mobile. A third branch is also immediately adjacent to a cluster of low- and moderate-income tracts. In addition, the bank has originated loans and deposits in low- and moderate-income geographies and to individuals of all income levels.

Whitney's record of opening and closing branches has had no impact on the accessibility of delivery systems in the Mobile AA. One branch was closed in an upper-income geography and one in a middle-income geography during the review period. Six branches have been opened in the Mobile AA with half in middle- and half in upper-income geographies.

Whitney's hours, services, and products offered do not vary in a way that inconveniences any portions of the assessment area. Banking hours are consistent throughout the AA. Lobby and drive-up hours are generally 9AM to 5PM Monday through Thursday, with extended drive-up hours. One branch has Saturday lobby hours, and several have Saturday drive-up hours.

A variety of deposit and loan products, and business services, are available at all Whitney branch locations. In addition to the products and services normally offered by a bank of Whitney's size and complexity, several deposit products are responsive to the needs of low- or moderate-income individuals and small businesses. Products of relevance to this evaluation are described under the Service Test for the State of Louisiana.

## **Community Development Services**

Whitney provides an excellent level of CD services in the Mobile AA, centered in affordable housing and economic development related to the provision of financial services to non-profits. This level of CD services had a positive impact on the Service Test rating. Services are centered in the development and promotion of affordable housing initiatives, and providing expertise in finance and lending to economic development groups. Officers of the Whitney CDC work with CD groups to expand capacity for additional community development.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Montgomery AA and in the Greenville NMA is stronger than the bank's performance in the Mobile AA and had a positive impact on the bank's overall Service Test rating in Alabama. The bank operates two of its three Greenville branches in moderate-income census tracts where 56% of the population resides. In Montgomery, two bank branches, or 40%, are located in moderate-income geographies. The bank also has a good level of CD services in the Montgomery AA. Refer to the State of Alabama section of Table 13 in Appendix D for the facts and data that support these conclusions.

## State of Florida

<b>CRA Rating for Florida:</b>	<b>Satisfactory</b>
<b>The Lending Test is rated:</b>	<b>Outstanding</b>
<b>The Investment Test is rated:</b>	<b>Low Satisfactory</b>
<b>The Service Test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- Whitney originated a very substantial majority of its reportable loans inside its AAs.
- Whitney's overall geographic and borrower distribution of small loans to businesses and home mortgage products is good.
- Whitney originated an excellent level of community development loans during the review period, which had a positive impact on the Lending Test rating.
- The use of innovative and flexible loan products enhances the bank's performance under the Lending Test.
- The level of qualified investments in Florida is adequate.
- Delivery systems are reasonably accessible to essentially all geographies and individuals of different income levels.
- Community development services are routinely provided and had a positive impact on the Service Test rating.

## Description of Institution's Operations in Florida

Whitney operates 8 branches and 10 ATMs within two AAs in the state of Florida. The Florida AAs include two metropolitan areas: Pensacola and Fort Walton. Approximately 3% of the bank's total deposits were attributed to these AAs, and the bank originated 4.2% by number, and 5.3% by dollar volume, of its total reported loans in these AAs.

The bank's primary market in the state is Pensacola. The Pensacola AA represents 75% of the Florida branch network, 98% of the Florida deposit base, and 93% of reported loan originations for this evaluation period. The Fort Walton AA represents 25% of the state branch network, 2% of the state deposit base, and 7% of reported loan originations in Florida for this evaluation period.

Whitney's deposit market share rank in the state of Florida is 124<sup>th</sup> with a market share of .07% out of a total of 595 lending institutions that accept deposits. State banking competition is aggressive and includes dominant affiliates of large national banking companies, large state chartered institutions, and numerous small community banks,



credit unions, and non-bank financial service providers. The top six competitors in this market include: Bank of America, First Union National Bank, Suntrust Bank, Southtrust Bank, Washington Mutual Bank FA, and Amsouth Bank, all of which compete with Whitney within its various markets.

Whitney's CRA reportable loan volume by number is comprised of 55% small loans to businesses and 45% HMDA purpose loans. The bank makes commercial loans of all types and sizes including commercial/industrial, commercial mortgage, business credit cards, and construction/land development loans. Examples of loans to retail customers include residential mortgages of all types, residential construction loans, personal loans (including lines of credit), and auto loans.

Refer to the Market Profile for the State of Florida in Appendix C for detailed demographics and other performance context information for the assessment areas that received full-scope reviews.

## **Scope of Evaluation in Florida**

We evaluated the bank's performance in the State of Florida by performing a full-scope review of the Pensacola AA and a limited scope review of the Fort Walton AA. We selected the Pensacola AA for a full-scope review because the bank maintains a substantial share of its business within this AA: approximately 98% of the deposits and 93% of reportable loan originations during the evaluation period in Florida. Additionally, the Pensacola AA is where the highest concentration of branches is located. Refer to Appendix A for more information on the scope of the evaluation.

The bank's overall rating is based primarily on the area that received a full-scope review. Small business lending performance was given slightly more weight under the Lending Test since it is the bank's primary business line, followed by home mortgage loans. We gave more weight to home purchase and refinance lending, since the bank's originations for these products represent a higher proportion of total home mortgage loans than home improvement loans.

We assessed CRA performance for the entire evaluation period, and also for two time periods: January 1, 1996 through December 31, 1998 and January 1, 1999 through December 31, 2002. We separated the bank's performance for these time periods so Whitney's CRA performance could be compared to other institutions that have received a CRA performance evaluation for a 3 to 4 year evaluation period. We gave slightly more weight to the bank's performance under the most recent 4-year evaluation period (January 1, 1999 through December 31, 2002) than the former 3-year period. The entire evaluation period was considered when deriving the bank's final CRA rating.

The geographic distribution of multi-family loans and the geographic and borrower distribution of small loans to farms are not relevant due to the small volume of loans originated or purchased during the evaluation period. Therefore, an analysis of the

geographic distribution of multi-family loans and the geographic and borrower distribution of small loans to farms has been eliminated from the Public Evaluation.

## **LENDING TEST**

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

The bank's performance under the Lending Test is rated "Outstanding". Based primarily on the bank's performance in the Pensacola AA, which received a full-scope review, the bank's performance is good.

### **Lending Activity**

Refer to the State of Florida section of Table 1 Lending Volume in Appendix D for the facts and data used to evaluate the bank's lending activity.

Whitney's lending activity demonstrates adequate responsiveness to the credit needs of its AA considering its size, resources, and primary business focus. Whitney's deposit market share of 3.90% (\$165 million) ranks tenth among 36 financial institutions.

In the Pensacola AA, 55% of the number and 61% of the dollar amount of Whitney's reported loans were small loans to businesses. Approximately 45% of the number and 39% of the dollar amount were home mortgage loans. Among the home mortgage loans originated in the AA, 45% were for home purchase, 41% were for refinance, and 13% were for home improvement.

Overall reportable loan volume is adequate in the Pensacola AA. This conclusion was reached after factoring in strong competition provided by credit unions, mortgage companies, and non-bank captive finance companies. Whitney ranks 20<sup>th</sup> in HMDA lending with 1.32% of the market, and 11<sup>th</sup> in small loans to businesses with 2.28% of the market.

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

Whitney's geographic distribution of lending is good. The geographic distribution of home mortgage loans is good and the geographic distribution of small loans to businesses is excellent.

Refer to the State of Florida section of Tables 2 - 6 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan origination and purchases in the Pensacola AA.

### ***Home Mortgage Loans and Small Loans to Businesses***

Refer to the following table for conclusions reached on the bank's geographic distribution of home mortgage loan originations for home purchase, home improvement,

and refinance products. The analysis focuses separately on low-and moderate-income geographies, and performance is considered good to excellent, depending on the market profile (see Appendix C), if the percentage of loans originated and purchased in those geographies is near to or exceeds the percentage of owner-occupied housing units in those geographies. The other measure of performance is the comparison of the bank’s overall market share of home purchase loans originated and purchased in the AA to the bank’s market share of home purchase loans in each income level of geography in that AA. The bank’s performance within an AA is considered good to excellent, depending on the bank’s market profile (See Appendix C), if its market share in low- and moderate-income geographies substantially meets or exceeds its overall market share.

Also, refer to the following table for conclusions reached on the bank’s geographic distribution of small loans to business originations. The analysis focuses separately on low-and moderate-income geographies, and performance is considered good to excellent, depending on the bank’s market profile (see Appendix C), if the percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in those geographies is near to or exceeds the percentage of businesses located in those geographies. The other measure of performance is the comparison of the bank’s overall market share of small loans to businesses in the AA to the bank’s market share of small loans to businesses in each income level of geography in that AA. The bank’s performance within an AA is considered good to excellent, depending on the bank’s market profile (see Appendix C), if its market share in low- and moderate-income geographies substantially meets or exceeds its overall market share.

We gave weight to both performance evaluation methods (demographic and market share) when deriving conclusions for the geographic distribution of small loans to businesses and home mortgage loans. We placed less emphasis on the market share data analysis during the earlier part of the evaluation period (1996 – 1998) since 2001 market share data is not relevant to this time period. We gave equal weight to market share data during the latter part of the evaluation period (1999 – 2002).

The following table displays our conclusions for geographic distribution by each reportable loan product for low and moderate-income census tracts. The table shows the bank’s performance during the January 1, 1996 through December 31, 1998 and January 1, 1999 through December 31, 2002 time periods.

Product	Geographic Distribution 1996-1998			Geographic Distribution 1999-2002		
	Low	Mod	Overall	Low	Mod	Overall
Home Purchase	A	P	Adequate	E	P	Good
Home Improvement	E	E	Excellent	G	G	Good
Refinance	G	A	Good	E	A	Good
Small Business	E	E	Excellent	E	E	Excellent
Overall Lending	E	G	Good	E	G	Good

Overall Conclusion (96-02)	<b>GOOD</b>
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A – Adequate, E – Excellent, G – Good, P – Poor, VP – Very Poor, NA – Not Applicable

***Lending Gap Analysis***

Reports and maps detailing Whitney's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained gaps were identified.

***Inside/Outside Ratio***

This analysis was performed at the state level. A very substantial majority of Whitney's home mortgage loans and small loans to businesses were originated within its AAs. By product, the bank originated the following percentages of loans inside its AAs in Florida.

<b>Loan Type</b>	<b>% Inside</b>
Home Purchase	94
Refinance	94
Home Improvement	99
Small Loans to Businesses	94
<b>Overall</b>	<b>95</b>

This performance was positively factored in the overall analysis of the geographic distribution of lending.

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

The distribution of Whitney's CRA reportable loans by income level of the borrower and to small businesses is good. The distribution of loans by income level of the borrower for home mortgage loans is adequate. The distribution of small loans to small businesses is good.

Refer to the State of Florida sections of Tables 8 – 11 in Appendix D for the facts and data used to evaluate the borrower distribution for the bank's loan originations and purchases in the Pensacola AA.

***Home Mortgage Loans and Small Loans to Businesses***

Refer to the following table for conclusions reached on the bank's borrower distribution of home mortgage loan originations for home purchase, home improvement, and refinance products. The analysis focuses on performance in lending to low- and moderate-income borrowers. Performance in lending to low-income borrowers can be considered good to excellent even though the percentage of loans originated and purchased to such borrowers is lower than the percentage of low-income families in the AA. This guideline recognizes the barriers that lenders may face in originating home purchase loans to low-income borrowers. Performance in lending to moderate-income borrowers is considered good to excellent, depending on the bank's market profile (See Appendix C), if the percentage of loans originated and purchased to moderate-income

borrowers is near to or exceeds the percentage of moderate-income families in the AA. The other measure of performance for borrower distribution is a comparison of the bank's market share of home purchase loans originated and purchased in an AA to the bank's market share of home purchase loans to each income level of borrower in that AA. The bank's performance within an AA is considered good to excellent, depending on the bank's market profile (See Appendix C), if its market share to low- and moderate-income borrowers substantially meets or exceeds its overall market share.

Also, refer to the following table for conclusions reached on the bank's performance in making loans to businesses of different sizes. The data provided to analyze the bank's performance under this criterion include the percentage of businesses within the AA that have revenues of \$1 million or less (demographic data) and the percentage of reported small loans to businesses that were originated and purchased to businesses with revenues of \$1 million or less. The percentage of bank lending that went to small businesses compared to the percentage of businesses within the AA that have revenues of \$1 million or less provides an indication of the bank's performance relative to the need within the community. Performance that substantially meets or exceeds the performance reflected by the demographic data is considered good to excellent. The other measure of performance is a comparison of the bank's market share of small loans to businesses with annual revenues of \$1 million or less to the bank's overall market share in making small loans to businesses. Performance is considered good to excellent, based on the bank's market profile (Appendix C), if the bank's market share of loans to small businesses substantially meets or exceeds its overall market share.

We equally weighted the two performance measurements (demographic data and market share) to derive an overall conclusion as to the bank's performance in making loans to businesses of different sizes and borrowers of different incomes during the 1999 through 2002 portion of the evaluation period. We placed more emphasis on the demographic performance measurement analysis during the 1996 through 1998 portion of the evaluation period since 2001 market share data is not relevant to this time period.

The following table shows our conclusions by each reportable loan product for borrower distribution and small loans to businesses of different sizes. Specifically, the table shows conclusions reached for lending distribution to low- and moderate-income borrowers and to small businesses with revenues equal to or less than \$1 million. The table shows the bank's performance during the January 1, 1996 through December 31, 1998 and January 1, 1999 through December 31, 2002 time periods.

Product	Borrower Distribution 1996-1998				Borrower Distribution 1999-2002			
	Low	Mod	<\$1mm	Overall	Low	Mod	<\$1mm	Overall
Home Purchase	P	G	NA	Adequate	G	E	NA	Good
Home Improvement	P	E	NA	Adequate	G	A	NA	Good
Refinance	VP	P	NA	Poor	A	A	NA	Adequate
Small Business	NA	NA	A	Adequate	NA	NA	G	Good
Overall Lending	P	A	A	Adequate	G	G	G	Good
<b>Overall Conclusion (96-02)</b>								<b>GOOD</b>

A – Adequate, E – Excellent, G – Good, P – Poor, VP – Very Poor, NA – Not Applicable

## Community Development Lending

Refer to the State of Florida section of Table 1 Lending Volume in Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans, but it does not separately list CD loans.

CD lending in the Pensacola AA is strong and had a positive impact on the Lending Test rating. Whitney originated 26 CD loans totaling \$8.3 million, the majority of which originated since 1999. This represents 49% of Tier 1 Capital allocated to Florida based on the percentage of bank deposits in the Pensacola AA. All but three of these loans are related to affordable housing. One loan in the amount of \$3.6 million was originated for the purpose of revitalization of a section of downtown Pensacola with part of the project dedicated to commercial use and part to affordable housing.

## Product Innovation and Flexibility

The use of innovative and flexible loan products enhances the bank's performance under the lending test, and positively impacted the rating. Specifically, the bank offers residential loan programs that benefit low- and moderate-income individuals and geographies.

### Whitney Neighborhood Housing Program

This program is designed to assist low- and moderate-income buyers who cannot qualify for traditional financing. This product contains flexible characteristics such as no origination fee or discount points, no reserve requirements, and flexible underwriting criteria such as expanded debt to income ratios, 97% financing, terms up to 30 years, acceptance of nontraditional credit references, one year employment requirement, and one year credit history requirement. Due to the flexible underwriting characteristics, Whitney retains these loans in their loan portfolio. Whitney originated 15 loans totaling \$1.1 million in the state of Florida from January 1, 1999 through December 31, 2002. Whitney originated 6 loans totaling approximately \$274 thousand from January 1, 1996 through December 31, 1998.

### Community Development Consumer Loans

This loan program provides accessible and affordable financing to those low to moderate income applicants who do not meet traditional underwriting guidelines. This program contains flexible terms and underwriting guidelines such as an expanded debt to income ratio, one year employment requirement, nontraditional credit references considered, loan amounts up to \$5,000, unsecured, and terms up to 48 months. Loan volume in this product over this CRA evaluation period is unknown.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance in the Fort Walton AA is not consistent with the bank's overall "Outstanding" performance under the Lending Test in Florida. The limited scope review indicates there are some portions of the bank's performance that are weaker than the overall state performance, primarily due to the limited presence of the bank in this market as reflected in its market share. The bank only entered the Fort Walton and Destin markets in 2000 and 2001, respectively. Refer to the State of Florida sections of Tables 1 - 11 in Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test in Florida is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Pensacola AA is adequate. Refer to the State of Florida section of Table 14 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

In addition to the allocation of bank-wide CD investments totaling \$184 thousand to the Pensacola AA, including the overall investment in the Whitney CDC, the bank made one \$5 thousand investment and 26 grants and donations totaling \$22 thousand. The grants and donations are primarily to non-profit organizations that provide services targeted to low- and moderate-income persons. Total qualified investments in the Pensacola AA represent 1.24% of Tier One Capital allocated to this AA.

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

Based on a limited-scope review, the bank's performance under the Investment Test in the Fort Walton AA is weaker than the bank's overall "Low Satisfactory" performance rating in Florida. However, the bank only entered the Fort Walton and Destin markets in 2000 and 2001, respectively. These are beach resort communities where CD opportunities are more limited than in Whitney's other AAs. Refer to the State of Florida section of Table 14 in Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the Service Test in Florida is rated "Low Satisfactory". Based on the full-scope review, the bank's performance in the Pensacola AA is adequate.

### **Retail Banking Services**

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

Whitney's service delivery systems are reasonably accessible to essentially all geographies and individuals of different income levels throughout the Pensacola AA. Whitney does not have any branches located in low- and moderate-income tracts in the Pensacola AA. However, only 5% of the geographies are designated low-income and only 4% of the population of the Pensacola AA lives in these tracts. Only 12% of the population lives in moderate-income geographies. Branch locations are proximate to the low- and moderate-income geographies. The main office in Pensacola is in an undesignated CT that is surrounded by the majority of the low- and moderate-income CTs in Escambia County. In addition, the bank has originated loans and deposits in low- and moderate-income geographies and to individuals of all income levels.

Whitney operates a total of 8 ATMs throughout the Pensacola AA. No ATMs are located in low-income CTs and one ATM is located in a moderate-income CT but it does not accept deposits.

Whitney's record of opening and closing branches had no impact on the accessibility of bank delivery systems in the Pensacola AA. One branch was closed in a moderate-income geography in 2002, and one in a middle-income geography in 1997. Whitney entered the Pensacola market through the acquisition of two banks in the area. The closed branch that had been located in a moderate-income CT was very far from any other acquired branch, and was located in a trailer. The bank made the decision to not make the branch permanent. Four branches in middle-income geographies were opened during the review period.

Whitney's hours, services, and products offered do not vary in a way that inconveniences any portions of the assessment area, including low- and moderate-income CTs and individuals. Banking hours are consistent throughout the AA. Lobbies are open from 9AM to 4:30PM Monday through Thursday, and until 5PM on Friday. All branches offer extended drive-up hours, and one drive up is open on Saturday mornings.

A variety of deposit and loan products, and business services, are available at all Whitney branch locations. In addition to the products and services normally offered by a bank of Whitney's size and complexity, several deposit products are responsive to the needs of low- or moderate-income individuals and small businesses. Products of relevance to this evaluation are described under the Service Test for the State of Louisiana.

## **Community Development Services**

Whitney provides a good level of CD services in the Pensacola AA, centered in affordable housing and economic development related to the provision of financial services to small businesses. This level of CD services had a positive impact on the



Service Test rating. Services include instructing participants at small business lending seminars and affordable housing fairs, providing financial advice to minority-owned small businesses, and providing expertise in finance and lending to economic development groups. The Whitney CDC is active in building affordable housing in the Pensacola AA, and officers of the CDC work with CD groups to expand capacity for additional development.

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

Based on limited-scope reviews, the bank's performance under the service test in the Fort Walton/Destin AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the Service Test in Florida. Refer to Table 13 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): 01/01/96 to 12/31/02 Investment and Service Tests and CD Loans: 01/01/96 to 12/31/02	
<b>Financial Institution</b>		<b>Products Reviewed</b>
Whitney National Bank (Whitney) New Orleans, Louisiana		Home mortgage loans, small loans to businesses
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Whitney Community Development Corporation	Holding company subsidiary	Community development loans
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
<u>Louisiana</u> New Orleans AA Baton Rouge AA Lafayette AA Lake Charles AA Houma AA Morgan City NMA	Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited Scope	None
<u>Texas</u> Houston AA	Full Scope	
<u>Mississippi</u> Gulfport AA	Full Scope	
<u>Alabama</u> Mobile AA Montgomery AA Greenville NMA	Full Scope Limited Scope Limited Scope	
<u>Florida</u> Pensacola AA Fort Walton/Destin AA	Full Scope Limited Scope	

## Appendix B: Summary of State Ratings

RATINGS Whitney National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
WHITNEY NATIONAL BANK	Outstanding	High Satisfactory	Outstanding	Outstanding
State:				
LOUISIANA	Outstanding	High Satisfactory	Outstanding	Outstanding
TEXAS	Outstanding	Outstanding	Outstanding	Outstanding
MISSISSIPPI	Low Satisfactory	Outstanding	Outstanding	Satisfactory
ALABAMA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
FLORIDA	Outstanding	Low Satisfactory	Low Satisfactory	Satisfactory

(\*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

# Appendix C: Market Profiles for Full-Scope Areas

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## State of Louisiana Full-Scope Areas

### New Orleans AA

Demographic Information for Full-Scope Area: New Orleans AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	386	16.58	20.98	31.09	26.42	4.92
Population by Geography	1,245,274	11.73	21.20	35.64	31.42	0.01
Owner-Occupied Housing by Geography	265,554	4.71	17.11	40.30	37.88	0.00
Businesses by Geography	79,424	8.36	20.60	33.34	37.69	0.01
Farms by Geography	1,159	2.59	17.77	44.69	34.94	0.00
Family Distribution by Income Level	320,169	24.88	15.58	18.74	40.80	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	129,538	21.07	29.53	33.87	15.54	0.00
Median Family Income	= \$29,212	Median Housing Value		= \$73,047		
HUD Adjusted Median Family Income for 2002	= \$44,000	Unemployment Rate		= 9.1%		
Households Below the Poverty Level	= 20.22%					

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The bank's New Orleans AA is comprised of seven southern Louisiana Parishes within the New Orleans Metropolitan Statistical Area (MSA) number 5560. They are Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. James, and St. Tammany Parishes. There are 386 Census Tracts (CTs) in the AA of which 64 are low-income, 81 moderate-income, 120 middle-income, and 102 upper-income CTs. Nineteen CTs have not been assigned an income classification.

The New Orleans AA represents 47% of the bank's branch network, 64% of the bank's deposit base, and 66% of CRA reportable loan volume for this CRA evaluation period in Louisiana. Whitney ranks as the 3<sup>rd</sup> largest commercial bank in the New Orleans AA with a 15% market share of deposits. The two competitors in this market with a higher market share are Hibernia National Bank (26% market share) and Bank One (21% market share). Whitney operates 39 full service branches and 89 ATMs within the New Orleans AA.

#### Population

The population living in the New Orleans AA was 1,245,274 in 1990 according to U.S. Census Bureau Data. Of this total population, 24.9% were low-income families, 15.6% were moderate-income families, 18.7% middle-income families, and 40.8% upper-income families. Approximately 17.7% of the families in the

population had income below the poverty level. In the City of New Orleans, comprised of Orleans Parish only, the poverty level is significantly higher. The total number of families in the New Orleans AA was 320,169 in 1990, with 10.5% in low-income, 20.1% in moderate-income, 36.5% in middle-income, and 32.8% in upper-income geographies.

#### Dwellings

In 1990, the housing stock in the New Orleans AA was 526,167 units; with 12.7% located in low-income CT's, 21.6% moderate-income CT's, 35.7% middle-income CT's, and 30.0% in upper-income CT's.

#### Median Housing Price

The average housing price in New Orleans was \$73,047, with 50.5% of the available units being owner-occupied, 36.4% of the units are occupied-rental units, and 13.1% of the units are vacant. The percentage of owner-occupied units located in the low, moderate, middle and upper income tract designations were: 4.7% in low-income tracts, 17.1% in moderate-income tracts, 40.3% middle-income tracts, and 37.9% in upper-income tracts.

#### Community Contacts

We conducted four community contact interviews in the New Orleans AA. Organizations contacted included affordable housing groups and small business financing resource providers. The contacts indicated a high level of community development opportunities, and that the banks in the areas have been responsive in meeting community credit needs. The primary needs identified by the community contacts are affordable housing, small business loans and technical assistance (financial education).

#### Affordable Housing Needs

Housing rehabilitation is identified as a critical need in the City of New Orleans and the City government has initiated many neighborhood revitalization efforts. The primary focus is assistance to low-income persons in repairing and maintaining their homes.

Of the City's 45,534 households classified as having extremely low incomes (0 to 30% of the MSA Median Family Income), 76% are classified as living in sub-standard housing conditions. In this same income category, the household classification having the greatest percent of housing needs is the large renter households. In this category, 92% of the households are reported as living in dilapidated or sub standard housing in need of rehabilitation or repair to bring them up to minimum decent safe and sanitary housing standards.

#### Barriers to Affordable Housing

Barriers to affordable housing in the AA include: cost of City zoning and building-permit fees for renovation or in-fill construction of new housing units, and the high costs to rehabilitate abandoned and blighted properties within local and federal government designated historic districts. The City has one of the highest numbers of designated

historic districts of any city in the United States (13 local historic districts and 18 national historic districts, including the oldest African-American neighborhood in the nation). In order to reduce these costs, the City recently revised the Comprehensive Zoning Ordinance to make the administrative process more user-friendly and efficient. To promote affordable housing, the City Division of Housing and Neighborhood Development (DHND) provides technical assistance, training, workshops and information designed to increase the public awareness of its programs and resources available to improve housing conditions and revitalize the City's neighborhoods.

#### Housing and Community Development Resources

The City of New Orleans administers a variety of Federal and State resources it makes available for implementing the City's revitalization strategy as listed below:

- Community Development Block Grants (CDBG)
- HOME Funds
- Emergency Shelter Grants
- Supportive Housing Program
- Social Service Community Block Grant
- New Orleans Economic Development Fund
- Neighborhood Housing Improvement Fund
- State emergency Shelter Grant
- Job Training Partnership Act
- Premier Bank Foundations Mortgage Program
- Fannie Mae
- Ford Foundation
- Enterprise Zone Program

#### City of New Orleans Recent Projects & Programs

New Orleans has re-organized and improved the Division of Housing and Neighborhood Development (DHND). The City has made improvements to several neighborhoods, through this department. The following is a list of some of these projects:

- Revitalization of Central City
- An entire block of new construction in Seventh Ward
- House New Orleans Initiative with Fannie Mae
- At Home in New Orleans by AFL-CIO Housing Investment Trust Fund and Freddie Mac
- Xavier Triangle Neighborhood Development Foundation
- New Business opportunities in Oretha Castle Haley Corridor
- Project Open House
- Project Nu-Coat
- Christmas in October
- Owner-occupied rehabilitation program
- Emergency Home repair program

- Several In-Fill projects, such as River Frederick Square and Whitney Square
- A.P. Tureaud Homeownership Zone
- Algiers Community Improvement Association

### Employment

The New Orleans MA reported a lower unemployment rate in 2002 of 5.4% in comparison to the State unemployment rate of 6.1% and the national rate of 5.8%. However, unemployment rates have increased steadily since 1999. The City has a concentration of low-wage employment, directly and indirectly related to the tourism industry, that has had a negative effect on the viability of the City's neighborhoods. As large companies continue to downsize, small businesses are creating many of the new jobs. Therefore, the City has focused on small business retention and creation to address the high unemployment and poverty rates.

The City's poor economy, which is viewed as a factor for many persons leaving the City, has also contributed to high unemployment rates among the remaining population. This in turn has increased the number of mortgage foreclosures on owner-occupied homes.

In 1990, economic statistics indicate that there were 79,424 businesses in the New Orleans AA. Of these, 6,642 were in low-income tracts, 16,360 were in moderate-income tracts, 26,481 were in middle-income and 29,937 were in upper-income tracts, respectively. There were 55,267 businesses with gross annual revenues less than \$1 million. The two major industries in the New Orleans AA were services at 36%, and retail trade at 17%.

The biotechnology industry is discovering that New Orleans is much more than simply its mantle as the food and hospitality capital of the nation. New Orleans was named one of the best biotech locations in the south in 2001. An expanding base of cutting-edge research facilities is putting New Orleans on the world's radar as a health-based technology transfer center. Among the research facilities in New Orleans are Louisiana State University Health Sciences Center, the Tulane University Health Sciences Center, the Audubon Center for Research of Endangered Species, the National Biodynamics Laboratory, the Pennington Biomedical Research Center, and the Gene Therapy Research Center.



## State of Texas Full-Scope Areas

### Houston AA

Demographic Information for Full-Scope Area: Houston AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	582	12.54	30.76	29.04	25.26	2.41
Population by Geography	2,818,199	9.07	28.71	32.36	29.86	0
Owner-Occupied Housing by Geography	533,891	5.76	22.64	32.26	39.34	0
Businesses by Geography	235,410	5.94	25.11	29.88	38.80	0.28
Farms by Geography	3,024	3.84	19.38	35.45	41.30	0.03
Family Distribution by Income Level	708,831	23.16	16.84	20.14	39.87	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	283,494	15.91	40.97	30.21	12.90	0
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$36,886 = \$59,600 = 13.69%	Median Housing Value Unemployment Rate		= \$75,454 = 3.65%		

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

The bank's Houston AA consists of Harris County, Texas, which includes the major City of Houston. The City covers the majority of the county's land area, and the county is the largest of Texas' 254 counties, with an estimated population of 3,400,578 in 2000. Houston is the fourth most populous city in the nation (trailing only New York, Los Angeles and Chicago), and is the largest in the southern U.S. and Texas. The metro area's population of 4.8 million is 10th largest among U.S. metropolitan statistical areas. The Houston CMSA covers five counties and 8,778 square miles, an area slightly smaller than Massachusetts but larger than New Jersey.

There are 582 CTs in the AA; 73 low –income, 179 moderate-income, 169 middle-income, and 147 upper-income. Fourteen CTs have not been assigned an income classification.

Approximately 8% of the bank's deposits and 2.7% of the bank's reportable loans originate from this AA. Whitney is a predominantly commercial lender in the Houston market. Approximately 80% of CRA reportable loans in this market are small loans to businesses and 20% are home mortgage loans. The bank makes commercial loans of all types and sizes including commercial/industrial, commercial mortgage, business credit cards, and construction/land development loans. Whitney operates 9 full service branches and 13 ATMs in the Houston AA.

Whitney ranks as the 17<sup>th</sup> largest commercial bank in the Houston AA with less than 1% of the deposit market share. Local banking competition is aggressive and includes affiliates and branches of large national banking companies, regional banks, numerous small community banks, credit unions, and non-bank financial service providers. The five leading competitors in this market include: Chase Manhattan Bank (34% market share), Bank of America, NA (10% market share), Wells Fargo Bank Texas, NA (7% market share), Bank One, NA (6% market share), and Washington Mutual Bank, FA (6% market share).

### Population

The population living in the Houston AA was 2,818,199 in 1990. Of the total population, 23.2% were low-income families, 16.8% were moderate-income families, and 20.1% middle-income families, and 39.9% upper-income families. Data shows 12.5% of families live below the poverty level. The number of families in the Houston AA was 708,831 in 1990, with 8.1% in low-income geographies, 26.9% in moderate-income, 32.6% in middle-income, and 32.4% upper-income geographies.

### Dwellings

In 1990, housing stock in the Houston AA was 1,173,808 with 9.6% located in the low-income CT's, 28.7% moderate-income CT's, 32.2% middle-income CT's, and 29.6% upper-income CT's. The county had approximately 1,205,516 households in 2000 according to the Census. This represents an average of 2.79 persons per household. The housing per square mile rate was 11.2% and the county's homeowner rate was 55.3%.

### Median Housing Price

The median housing price in 1990 for the Houston AA was \$75,454, with 45.5% of the available units being owner-occupied, 42% of the units are occupied-rental units, and 12.6% of the units are vacant. The owner-occupied units were located in the following tract designations: 5.8% in low-income tracts, 22.6% in moderate-income tracts, 32.3% in middle-income tracts, and 39.3% in upper-income tracts. Houston has the most affordable housing of the 10 most populated metropolitan areas; Houston housing costs are 39% below the average of 26 U.S. urban populations of more than 1.5 million.

### Community Contacts

We interviewed one community contact and reviewed summaries of eight recent community contact interviews conducted in the Houston AA. Organizations contacted included several governmental agencies and entities involved in economic development as well as several non-profit organizations that provide services to the community. The contacts indicated a high level of community development opportunities and that the banks in the areas have been responsive in meeting community credit needs. The primary needs identified by the community contacts are affordable housing, small business loans and technical assistance (financial education).

### Affordable Housing Needs

The need for affordable housing and housing rehabilitation has continued to increase as well as the need to address housing deficiencies and overcrowding. The City's first priority is to provide housing and supportive services to its low-income population, including renters and homeowners. The City's endeavors in the area of homeownership include the rehabilitation of owner-occupied housing units. It plans to use CDBG and HOME funds and to leverage private sector resources. The City also makes available to these first-time home purchasers direct homebuyers assistance, such as mortgage assistance, downpayment and closing cost assistance, and financial counseling. AA housing priorities include the acquisition, rehabilitation and new construction of housing units for its elderly low-income residents by selecting projects that demonstrate an effective use of Federal funds and represent the best effort at leveraging private and nonfederal resources.

#### Barriers to Affordable Housing

Despite the fact that Houston has the second lowest cost of living among major American cities, the barriers to affordable housing in the MA include the lack of sufficient downpayment for many first-time homeowners. To overcome this obstacle, the City's Homebuyers Assistance Program commits resources to assist low and moderate-income persons with downpayment and closing cost assistance. Other barriers of particular concern include building codes, tax policies affecting land use controls, fees and charges, growth limits, and policies that affect the return on residential investment.

#### Housing and Community Development Resources

The City of Houston maintains a full compliment of programs to improve housing for Houston's low-to-moderate income residents. Houston residents can take advantage of one of the numerous housing assistance programs available through the Housing and Community Development Department.

- Community Development Block Grants (CDBG)
- Home Investment Partnerships (HOME)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Emergency Shelter Grants Programs
- Designation as an Enhanced Enterprise Community

These programs are available to assist in increasing homeownership through mortgage assistance programs, repairing or improving homes, and helping to renovate and build affordable rental housing and transitional housing.

Single Family Mortgage Assistance Programs provide financial assistance for downpayment, closing costs and prepaid items for low- and moderate-income homebuyers. In addition, education and counseling are provided to help with the home buying experience. The City of Houston provides operating assistance and funding for Community Housing Development Organizations to develop and sponsor affordable housing projects. Multi-Family Housing Programs help provide quality affordable rental housing to low-to-moderate income citizens of Houston.

The Emergency Home Repair Program provides assistance to very low-income elderly and/or disabled homeowners with essential homes repairs. A Home Improvement Loan Program is also available for low-to-moderate income homeowners who live in Houston's Enhanced Enterprise Community and wish to renovate their homes. Through Homeless Housing the City provides assistance to nonprofit agencies and shelter providers in preventing homelessness and breaking the cycle of homelessness through transitional housing and supportive services.

### Employment

The Houston MA reported an unemployment rate in 2002 of 6.5%, which is comparable to the state unemployment rate of 6.3%. However, unemployment rates have increased sharply since 1999 when the state rate was 5.1%.

In 1990, it was reported that there were 235,410 businesses in the Houston MSA-Harris County. Of these, 13,978 were in low-income tracts, 59,121 were in moderate-income tracts, 70,329 were in middle-income and 91,333 were in upper-income tracts, respectively. There were 156,972 businesses with gross annual revenues less than \$1 million. The two major industries in the AA were services at 33.20% and retail trade at 16.40%.

Among the 10 largest cities, Houston ranked second in the rate of job growth. It is forecasted that Houston will have an additional 81,000 new jobs by the end of this year. It is important to note that 90% of those new jobs are in the non-energy dependent sectors, thereby adding to the City's economy and economic diversity.

## State of Mississippi Full-Scope Areas

### Gulfport/Biloxi AA

Demographic Information for Full-Scope Area: Gulfport/Biloxi AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	37	5.41	18.92	54.05	16.22	5.41
Population by Geography	174,644	2.03	12.99	73.53	11.44	0.01
Owner-Occupied Housing by Geography	42,724	1.28	11.40	73.01	14.31	0
Businesses by Geography	12,151	7.71	15.97	65.21	11.10	0
Farms by Geography	221	2.26	9.50	80.54	7.69	0
Family Distribution by Income Level	47,302	22.82	17.54	21.31	38.33	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	19,090	2.99	17.17	73.37	6.47	0
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$27,305 = \$44,400 = 17.96%	Median Housing Value Unemployment Rate			= \$56,401 = 3.40%	

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

The bank's Gulfport AA consists of 31 CTs in Harrison County and 6 CTs in Hancock County. This consists of a majority of the Biloxi/Gulfport MSA 0920, including the City of Gulfport but excluding a portion of Biloxi and all of Jackson County. There are 37 CTs in the AA; 2 low-income, 7 moderate-income, 20 middle-income, and 6 upper-income CTs. Two tracts have not been assigned an income classification. Whitney ranks as the 4<sup>th</sup> largest commercial bank in the AA with 7.53% of the deposit market share. The top three competitors in the market include: Hancock Bank (39.24% market share), Keesler Federal Credit Union (20.96% market share), and Peoples Bank of Biloxi (15.53% market share). Whitney operates 8 full service branches and 15 ATMs here.

#### Population

The population living in the Gulfport AA was 174,644 in 1990. Of the 19,090 families in the AA, 22.8% were low-income families, 17.5% were moderate-income families, 21.3% were middle-income families, and 38.3% were upper-income families. Data shows 15.3% of families and 18% of households were below the poverty level. Approximately 3% of families live in low-income geographies, 17.17% live in moderate-income CTs, 73.37% live in middle-income CTs, and 6.47% live in upper-income geographies.

#### Dwellings

In 1990, housing stock in the Gulfport AA was 75,886 with 1.9% located in low-income CT's, 12.4% in moderate-income CT's, 72.8% in middle-income CT's, and 12.9% in upper-income CT's.

### Median Housing Price

The median housing price in the Gulfport AA was \$56,401, with 56.3% of the available units being owner-occupied, 28.0% of the units are occupied-rental units, and 15.7% of the units are vacant. The owner-occupied units were located in the following tract designations: 1.3% in low-income tracts, 11.4% in moderate-income tracts, 73.0% in middle-income tracts, and 14.3% in upper-income tracts.

### Community Contacts

We reviewed summaries of three recent community contact interviews conducted in the Gulfport/Biloxi MA. Organizations contacted included two governmental agencies and a non-profit organization that provides services to the community. The contacts indicated a moderate level of community development opportunities and that the banks in the areas have been responsive in meeting community credit needs. The primary needs identified by the community contacts are affordable housing and loans to new businesses.

### Affordable Housing Needs

An inadequate supply of two- and three-bedroom single-family rental units that are affordable by low-income and very low-income families has been identified as a critical need. As rents increase because of high demand, low-income families are forced to accept less expensive but substandard housing. For example, Section 8 tenants may experience difficulty in locating units that meet the needs of their family size.

### Barriers to Affordable Housing

The Consolidated Plan for the Gulfport AA identified the following barriers to affordable housing:

- Stringent requirements for financing home purchases.
- Restrictive zoning and code enforcement requirements.

### Housing and Community Development Resources

To reduce the number of households below the poverty line, the Gulfport AA administers a Housing Rehabilitation Loan program to assist low-income homeowners. Through customized loan repayment programs, very low-income homeowners are able to afford decent housing because the Gulfport AA ensures that do not pay more than 30 percent of their income on home payments.

The Gulfport AA promotes affordable housing development by providing assistance to potential developers and by encouraging economic development targeted for low-income residents. In addition to the CDBG Section 8 rental vouchers and certificates, the Gulfport AA also utilizes the HOME grant funds to construct affordable housing development. The Gulf Coast Society for Retarded Citizens utilizes the HUD Section 811 funds to construct group homes for the disabled. The Gulfport AA was not designated an empowerment zone.

Employment

The Gulfport/Biloxi/Pascagoula MA reported an unemployment rate in 2002 of 5.2%, which is lower than the State unemployment rate of 6.8% and the national average of 5.8%. Growth in the casino and tourism industries in the area accounts for much of the job growth.

In 1990, it was reported that there were 12,151 businesses in the Gulfport AA. Of these, 937 were in low-income tracts, 1,941 were in moderate-income tracts, 7,924 were in middle-income tracts, and 1,349 were in upper-income tracts, respectively. There were 9,046 businesses with gross annual revenues less than \$1 million. The two major industries in the AA were services at 34.46% and retail trade at 18.17%.

## State of Alabama Full-Scope Areas

### Mobile MA

Demographic Information for Full-Scope Area: Mobile MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	144	14.58	15.28	45.14	22.22	2.78
Population by Geography	476,923	10.66	11.53	52.75	24.59	0.47
Owner-Occupied Housing by Geography	120,538	6.22	9.56	57.42	26.80	0.00
Businesses by Geography	26,740	5.75	8.23	57.23	26.42	2.38
Farms by Geography	706	2.97	3.68	73.37	19.41	0.57
Family Distribution by Income Level	130,249	22.99	16.63	19.98	40.40	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	51,604	19.17	16.18	51.80	12.84	0.00
Median Family Income	\$28,192	Median Housing Value				\$58,329
HUD Adjusted Median Family Income for 2002	\$45,100	Unemployment Rate (1990)				3.72%
Households Below the Poverty Level	19.09%					

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

The bank's Mobile AA consists of the Mobile and Baldwin Counties and is equal to the Mobile MSA 5160. The MA is located in the extreme southwest corner of Alabama, bordering Mississippi on the West, Florida on the east, and Mobile Bay and the Gulf of Mexico on the South. There are 144 Census Tracts (CTs) in the MA: 21 low-income, 22 moderate-income, 65 middle-income, and 32 upper-income. Four CTs have not been assigned an income classification. Whitney ranks as the 6th largest commercial bank in the Mobile MA with 3% of the market share. The top five competitors in this market include: Regions Bank (34% market share), Amsouth (18% market share), Compass Bank (11% market share), Southtrust (11% market share), and Colonial Bank (6% market share). Whitney operates 11 full service branches and 11 ATMs within the Mobile AA.

#### Population

The population living in the Mobile MA was 476,923 in 1990. Of the total population, 23.0% were low-income families, 16.6% were moderate-income families, 20.0% middle-income families, and 40.4% upper-income families. 16% of the families in the population had income below the poverty level.



The number of families in the Mobile MA was 130,249 in 1990, with 9.6% in low-income, 10.9% in moderate-income, 54.0% in middle-income, and 25.5% in upper-income geographies.

#### Dwellings

In 1990, housing stock in the Mobile AA was 202,153 units; with 9.9% located in low-income CT's, 11.1% in moderate-income CT's, 55.0% in middle-income CT's, and 24.0% in upper-income CT's.

#### Median Housing Price

The average housing price in Mobile was \$58,329, with 59.6% of the available units being owner-occupied, 26.4% of the units are occupied-rental units, and 14.0% of the units are vacant. The owner-occupied units were located in the following tract designations: 6.2% in low-income tracts, 9.6% in moderate-income tracts, 57.4 middle-income tracts, and 26.8% in upper-income tracts.

#### Community Contacts

We made one community contact and reviewed available summaries of recent community contact interviews conducted in the Mobile MA. Organizations contacted included governmental agencies, entities involved in economic development, and non-profit organizations that provide services to the community. The contacts indicated a moderate level of community development opportunities and that the banks in the area have been responsive in meeting community credit needs. The primary needs identified by the community contacts are affordable housing and technical assistance (financial education), including small business budgeting.

#### Affordable Housing Needs

There are three critical housing needs: the reduction of substandard housing conditions, the ability to maintain and improve the existing housing stock, and the ability to maximize the housing opportunities for families in need of affordable housing. These needs may be met with support services and rehabilitation, rental assistance, new construction, and homebuyer assistance.

Studies indicate that Mobile has always had a supply of vacant standard units available for the *demand market*. The problem in Mobile is affordability. Home ownership is expensive and rental costs are too high relative to income. This is compounded by utility costs, which are far too high for the middle to low-income families and households.

#### Barriers to Affordable Housing

Barriers to affordable housing in the MA include low household income, quality of existing homes, social problems and crime in high-density areas, education, and resistance to assistance, high unemployment rates, and the increased cost to construct new housing. The majority of housing problems facing the City's very low, low and moderate-income population include excessive rent burden, substandard housing conditions and overcrowding, in that order. In addition, many neighborhoods have some historic significance.

Historic preservation within the rehabilitation process interjects requirements that address the needs of a particular building based upon its potential for historic significance or for its contribution to a neighborhood. Focusing on the preservation of historic significance does not take into account the desire to reduce the cost burden on very low-income families dwelling in older buildings in terms of maintenance and energy efficiency. Historic preservation interests impede improvements that ultimately could reduce the inhabitants' costs and increase affordability.

The local strategy is to reduce substandard housing conditions, maintain and improve the existing housing stock, and maximize the housing conditions. The City of Mobile has determined that economic development is the primary issue that affects and promotes affordable housing. Other primary activities will consist of support services and rehabilitation, rental assistance, new construction, and homebuyers' assistance.

#### Housing and Community Development Resources

Mobile's primary federal funding sources include Community Development Block Grant (CDBG), HOME, and Emergency Shelter Grant (ESG), as well as public housing modernization, drug elimination, youth sports, and youth build programs. Resources available from the State include additional ESG funds along with HOPWA and Shelter Plus Care funds. The City of Mobile also draws upon support from the local United Way and its member service providers.

#### Employment

The Mobile MA reported a high unemployment rate in 2002 of 5.9% in comparison to the State unemployment rate of 5.9%, and the national rate of 5.8%. However, unemployment rates have oncreased since 2000.

In 1990, it was reported that there were 26,740 businesses in Mobile. Of these, 1,537 were in low-income tracts, 2,200 were in moderate-income tracts, 15,302 were in middle-income and 7,064 were in upper-income tracts, respectively. There were 21,307 businesses with gross annual revenues less than \$1 million. The two major industries in the Mobile AA were services at 37%, and retail trade at 20%. Economically, the city's largest employer is The Mobile County School System, followed by the University of South Alabama, Mobile Infirmary, and Scott Paper. With the world's largest forest products terminal, the Port of Mobile ranks first nationally for wood pulp exports and second for forest products.

## State of Florida Full-Scope Areas

### Pensacola MA

Demographic Information for Full-Scope Area: Pensacola MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	67	8.96	17.91	50.75	14.93	7.46
Population by Geography	344,406	4.08	12.26	62.68	20.74	0.24
Owner-Occupied Housing by Geography	86,356	3.05	10.54	63.69	22.72	0.00
Businesses by Geography	25,731	7.22	11.76	58.79	19.76	2.48
Farms by Geography	762	2.10	7.48	72.18	17.98	0.26
Family Distribution by Income Level	94,100	20.52	18.10	21.88	39.49	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	36,348	6.98	17.93	62.89	12.20	0.00
Median Family Income	\$29,922	Median Housing Value Unemployment Rate (1990)				\$61,345 3.10%
HUD Adjusted Median Family Income for 2002	\$45,300					
Households Below the Poverty Level	15.51%					

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

The bank's Pensacola AA consists of the Escambia and Santa Rosa Counties, which equates to the Pensacola MSA 6080. The MA includes two municipalities (the City of Pensacola and the Town of Century) and the incorporated jurisdictions of Milton, Gulf Breeze, and Jay. There are 67 CTs in the MA: 6 low-income, 12 moderate-income, 34 middle-income, and 10 upper-income. Five CTs have not been assigned an income classification.

Whitney ranks as the 10<sup>th</sup> largest commercial bank in the Pensacola MA with 4% of the market share. The top five competitors in this market include: Amsouth Bank (15% market share), Pen Air FCR (9% market share), Bank of America, NA (8% market share), First Union NB (7% market share), and Regions Bank (6% market share). WNB operates 6 full service branches and 8 ATMs within the Pensacola MA.

#### Population

The population living in the Pensacola MA was 344,406 in 1990. The City of Pensacola is now 35<sup>th</sup> in municipal size in the State of Florida, down from 26<sup>th</sup> in 1990 and 15<sup>th</sup> in 1980. This decrease in population is the result of a general decrease in average household size attributed to an aging population, and an out-migration of population from the City. Finally, the City annexed very little residential property between 1990 and 2000.

Of the total population, 20.5% were low-income families, 18.1% were moderate-income families, 21.9% middle-income families, and 39.5% upper-income families. 12.9% of the population had income below the poverty level. The number of families in the Pensacola MA was 94,100 in 1990, with 3.5% living in low-income geographies, 11.4% in moderate-income, 63.4% in middle-income, and 21.7% in upper-income geographies.

### Dwellings

In 1990, housing stock in Pensacola was 145,061 units; with 4.2% located in low-income CT's, 12.1% in moderate-income CT's, 60.4% in middle-income CT's, and 23.2% in upper-income CT's.

### Median Housing Price

The average housing price in Pensacola was \$61,345. Approximately 59.5% of the available units are owner-occupied, 29.1% of the units are occupied-rental units, and 11.4% of the units are vacant. The owner-occupied units were located in the following tract designations: 3% in low-income tracts, 10.5% in moderate-income tracts, 63.7 middle-income tracts, and 22.7% in upper-income tracts.

### Community Contacts

We made one community contact and reviewed available summaries of recent community contact interviews conducted in the Pensacola MA. Organizations contacted included governmental agencies and entities involved in affordable housing. The contacts indicated a moderate level of community development opportunities and that the banks in the area have been responsive in helping meet community credit needs. The primary needs identified by the community contacts are affordable housing and general economic development, including small business stimuli.

### Affordable Housing Needs

There is a need in the community for livable affordable housing for low-income families, the elderly, and renters with large families. Pensacola is faced with a declining inner city population base while outlying areas continue to grow. Poverty, unemployment, economic dependency and poor housing conditions persist in many areas of the City and region.

### Barriers to Affordable Housing

Barriers to affordable housing in the MA include stringent building codes, which drive up the cost of housing in the area. Current public and private redevelopment efforts have been supported by a new neighborhood policing program, enhanced code enforcement initiatives, and the development of neighborhood preservation standards. The City continues to focus on neighborhoods as the building blocks for a successful revitalization. Several programs have been developed to enhance organization and communication to support neighborhood-based problem solving. The City is implementing programs aimed at correcting environmental concerns and is a partner in promoting economic development and creating jobs in the region with particular focus on bringing economic opportunity and reinvestment back to the inner city.

Another potential barrier to affordable housing is growth limits. The Florida Growth Management Act requires that the development or protection of real property within jurisdictional boundaries comply with a comprehensive State-approved local government plan. The effect of such plans is to limit or control the rate, density, and type of growth within the State to ensure the availability of adequate infrastructure. Currently, an adequate supply of developable residential sites and usable redevelopment property is available to prevent this requirement from adversely affecting housing affordability. However, as growth begins to force residential development near these protected areas, the costs will quickly begin to spiral upward.

#### Housing and Community Development Resources

First-time homebuyer assistance, housing rehabilitation, and rental development objectives are dependent on the cooperation and support of local private financial institutions, primarily banks and mortgage lenders. Other resources available in the community include: Habitat for Humanity; development of affordable rental units by Community Equity Investments and AMR at Pensacola; operation of a runaway youth shelter by Lutheran Ministries; and the provision of housing and services for the homeless by Loaves and Fishes Soup Kitchen, The Salvation Army, and the Waterfront Mission.

The City of Pensacola is undergoing renewal, including new office, retail, entertainment, recreation, education and residential development. Numerous redevelopment and revitalization projects have been undertaken in the downtown area, along the Pensacola Bay waterfront and in many of the City's neighborhoods and business districts. Redevelopment programs include initiatives to improve area housing, develop vacant lots with new infill housing, and improve vacant and/or underutilized commercial and industrial properties.

The City of Pensacola, in cooperation with private sector partners, is actively implementing a program to construct new housing units on vacant infill lots. Second, the City has created several programs to revitalize neighborhoods and to stimulate neighborhood economic development. Third, the City is actively engaged in the rehabilitation of substandard housing units for residential occupancy. Finally, the City has approved several new residential developments that will increase the available housing stock. According to Inspection Services Department data, a total of 252 new single-family residences have been permitted in the City from 2000 through 2002. Additionally, 7 two-family buildings (14 dwelling units) and 7 multi-family buildings (3 or more dwelling units per building) were permitted.

#### Employment

The Pensacola MA reported a lower unemployment rate in 2002 of 4.7% in comparison to the State unemployment rate of 5.5% and the national rate of 5.8%. However, unemployment has been rising since 2000.

In 1990, it was reported that there were 25,731 businesses in the Pensacola AA. Of these, 1,857 were in low-income tracts, 3,025 were in moderate-income tracts; 15,126 were in middle-income and 5,085 were in upper-income tracts, respectively. There

were 18,063 businesses with gross annual revenues less than \$1 million. The two major industries in the Pensacola AA were services at 33%, and retail trade at 16%. Economically, the MA is largely dependent on employment opportunities in the tourism, retail and governmental/military sectors. The Pensacola Naval Air Station, the Navy's Whiting Field, and related support facilities are located here. The area is heavily dependent on civilian employment at military institutions. Other employment opportunities exist in the tourism and retail sectors of the economy.

# Appendix D: Tables of Performance Data

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## Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.



- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1

million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

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

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

## Tables of Performance Data 1996-2002

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: ALL												
Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002												
MA/Assessment Area (2002):	% of BANK Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of BANK Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>State of Louisiana</b>												
Full Scope: New Orleans AA	53.34	13,554	1,134,885	20,003	2,229,191	53	6,333	301	153,237	33,911	3,523,646	51.21
Limited Scope:												
Baton Rouge AA	9.41	3,005	259,261	2,849	289,456	13	2,120	117	30,365	5,984	581,202	8.23
Lafayette AA	5.23	1,196	76,813	2,093	217,854	11	1,407	23	10,775	3,323	306,849	4.04
Lake Charles AA	2.91	744	33,563	1,072	101,184	3	86	29	64,406	1,848	199,239	3.51
Houma AA	5.01	2,075	115,316	1,060	133,732	36	2,425	14	957	3,185	252,430	5.86
Morgan City AA	4.56	1,168	46,240	1,684	152,116	28	2,709	21	28,522	2,901	229,587	4.00
<b>State of Texas</b>												
Full Scope: Houston AA	2.71	335	38,849	1,354	196,969	4	226	31	54,933	1,724	290,977	8.02
<b>State of Mississippi</b>												
Full Scope: Gulfport AA	2.83	1,216	87,378	549	46,704	28	3,934	8	708	1,801	138,724	3.68
<b>State of Alabama</b>												
Full Scope: Mobile AA	7.68	1,690	168,357	3,145	400,752	29	9,202	17	9,038	4,881	587,349	3.87
Limited Scope:												
Montgomery AA	1.78	311	29,802	758	67,685	21	1,516	43	21,077	1,133	120,080	2.78
Greenville AA	0.41	170	4,707	71	6,874	11	1,016	11	7,838	263	20,435	1.69
<b>State of Florida</b>												
Full Scope: Pensacola	3.86	1,081	116,696	1,339	182,783	7	520	26	8,301	2,453	308,300	3.08
Limited Scope:												
Fort Walton Beach/Destin	0.27	117	17,228	53	12,719	0	0	0	0	170	29,947	0.05

\* Loan Data as of December 31, 2002.

\*\* The evaluation period for Community Development Loans is From January 01, 1996 to December 31, 2002.

\*\*\* Deposit Data as of June 30, 2001.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: ALL				Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002					Market Share (%) by Geography <sup>†</sup>				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans						
<b>State of Louisiana</b>																
Full Scope: New Orleans AA	3,284	45.36	4.71	3.38	17.11	9.77	40.30	34.74	37.88	52.10	2.65	1.76	1.98	2.53	3.04	
Limited Scope:																
Baton Rouge AA	998	13.78	7.06	2.91	15.90	5.81	42.09	41.28	34.95	50.00	1.63	3.45	1.19	1.38	1.92	
Lafayette AA	312	4.31	5.07	3.21	7.57	9.29	26.54	17.31	60.82	70.19	1.25	3.13	2.86	.63	1.33	
Lake Charles AAS	137	1.89	4.81	0.73	14.20	6.57	52.16	51.82	28.84	40.88	1.43	0.00	1.06	1.02	2.00	
Houma AA	571	7.89	0.00	0.00	9.10	7.01	75.92	61.30	14.97	31.70	3.17	0.00	3.82	2.97	3.50	
Morgan City AA	246	3.40	0.00	0.00	9.14	2.85	51.60	47.97	39.26	49.19	2.48	0.00	1.85	2.29	2.71	
<b>State of Texas</b>																
Full Scope: Houston AA	121	1.67	5.76	5.79	22.64	14.88	32.26	25.62	39.34	53.72	0.07	0.19	0.09	0.06	0.08	
<b>State of Mississippi</b>																
Full Scope: Gulfport AA	327	4.52	1.28	0.00	11.40	7.65	73.01	58.41	14.31	33.94	1.07	0.00	1.73	1.08	0.83	
<b>State of Alabama</b>																
Full Scope: Mobile AA	581	8.02	6.22	6.02	9.56	5.85	57.42	52.32	26.80	35.80	0.99	3.15	3.37	0.85	0.91	
Limited Scope:																
Montgomery AA	71	0.98	4.94	0.00	17.56	12.68	44.13	38.03	33.37	49.30	0.41	0.00	1.07	0.61	0.17	
Greenville AA	28	0.39	0.00	0.00	51.50	46.43	39.50	28.57	9.00	25.00	1.69	0.00	2.25	0.00	2.38	
<b>State of Florida</b>																
Full Scope: Pensacola AA	491	6.78	3.05	2.65	10.54	3.05	63.69	55.19	22.72	39.10	0.76	2.78	0.38	0.63	1.12	
Limited Scope: Fort Walton Beach/Destin AA	73	1.01	0.00	0.00	7.71	9.59	68.72	78.08	23.57	12.33	0.61	0.00	2.42	0.59	0.27	

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased by the bank.

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

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

Geographic Distribution: HOME IMPROVEMENT			Geography: ALL								Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>State of Louisiana</b>															
Full Scope: New Orleans AA	5,644	56.47	4.71	4.66	17.11	12.53	40.30	34.83	37.88	47.98	18.21	18.72	16.67	16.42	20.73
Limited Scope:															
Baton Rouge AA	839	8.39	7.06	5.13	15.90	8.82	42.09	43.38	34.95	42.67	7.18	10.34	7.30	6.46	7.63
Lafayette AA	549	5.49	5.07	1.82	7.57	3.28	26.54	15.85	60.82	79.05	9.09	10.00	4.55	6.28	10.57
Lake Charles AA	392	3.92	4.81	1.02	14.20	8.93	52.16	52.81	28.84	37.24	10.65	9.09	12.75	10.53	10.28
Houma AA	746	7.46	0.00	0.00	9.10	8.98	75.92	68.90	14.97	21.98	13.29	0.00	14.71	12.56	15.56
Morgan City AA	605	6.05	0.00	0.00	9.14	4.46	51.60	55.37	39.26	40.17	12.68	0.00	16.67	16.18	8.86
<b>State of Texas</b>															
Full Scope: Houston AA	147	1.47	5.76	25.17	22.64	25.85	32.26	21.09	39.34	27.89	0.79	4.38	1.21	0.50	0.44
<b>State of Mississippi</b>															
Full Scope: Gulfport AA	429	4.29	1.28	0.93	11.40	13.05	73.01	72.73	14.31	13.29	5.43	6.25	7.52	4.62	8.66
<b>State of Alabama</b>															
Full Scope: Mobile AA	351	3.51	6.22	1.71	9.56	2.56	57.42	57.55	26.80	38.18	4.53	5.00	0.00	3.82	7.12
Limited Scope:															
Montgomery AA	52	0.52	4.94	1.92	17.56	26.92	44.13	40.38	33.37	30.77	3.31	0.00	6.32	3.80	1.64
Greenville AA	96	0.96	0.00	0.00	51.50	47.92	39.50	37.50	9.00	14.58	18.10	0.00	14.29	26.09	25.00
<b>State of Florida</b>															
Full Scope: Pensacola AA	142	1.42	3.05	2.82	10.54	10.56	63.69	54.23	22.72	32.39	2.54	12.50	2.33	2.12	3.23
Limited Scope: Fort Walton Beach/Destin	3	0.03	0.00	0.00	7.71	33.33	68.72	33.33	23.57	33.33	0.73	0.00	7.14	0.00	1.33

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased by the bank.

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: ALL				Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>State of Louisiana</b>																
Full Scope: New Orleans AA	4,584	48.97	4.71	1.77	17.11	6.98	40.30	32.00	37.88	59.25	3.76	2.13	2.27	3.10	4.79	
Limited Scope:																
Baton Rouge AA	1,163	12.42	7.06	1.55	15.90	4.21	42.09	41.70	34.95	52.54	2.07	1.35	0.62	2.08	2.43	
Lafayette AA TX	333	3.56	5.07	0.60	7.57	2.70	26.54	15.02	60.82	81.68	2.04	0.00	1.15	1.18	2.35	
Lake Charles AA	215	2.30	4.81	0.00	14.20	6.05	52.16	46.98	28.84	46.98	1.40	0.00	0.99	1.32	1.68	
Houma AA	757	8.09	0.00	0.00	9.10	5.81	75.92	62.22	14.97	31.97	3.43	0.00	2.73	3.34	3.81	
Morgan City AA	310	3.31	0.00	0.00	9.14	1.29	51.60	49.68	39.26	49.03	2.84	0.00	1.94	3.47	2.41	
<b>State of Texas</b>																
Full Scope: Houston AA	62	0.66	5.76	3.23	22.64	27.42	32.26	24.19	39.34	45.16	0.04	0.11	0.11	0.05	0.02	
<b>State of Mississippi</b>																
Full Scope: Gulfport AA	457	4.88	1.28	0.00	11.40	10.50	73.01	64.99	14.31	24.51	1.97	0.00	2.48	1.86	2.28	
<b>State of Alabama</b>																
Full Scope: Mobile AA	758	8.10	6.22	0.53	9.56	2.11	57.42	49.21	26.80	48.15	0.78	0.61	0.00	0.71	1.03	
Limited Scope:																
Montgomery AA	188	2.01	4.94	0.00	17.56	13.83	44.13	42.55	33.37	43.62	1.52	0.00	1.77	2.00	1.19	
Greenville AA	46	0.49	0.00	0.00	51.50	56.52	39.50	13.04	9.00	30.43	5.98	0.00	7.78	2.17	6.25	
<b>State of Florida</b>																
Full Scope: Pensacola AA	447	4.78	3.05	2.68	10.54	3.58	63.69	60.18	22.72	33.33	1.23	2.50	0.93	1.23	1.24	
Limited Scope: Fort Walton Beach/Destin	41	0.44	0.00	0.00	7.71	4.88	68.72	82.93	23.57	12.20	0.17	0.00	0.61	0.17	0.10	

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased by the bank.

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: ALL										Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>State of Louisiana</b>																
Full Scope: New Orleans AA	42	63.64	20.40	11.90	21.95	28.57	29.68	38.10	27.98	21.43	7.91	10.53	9.76	9.30	2.78	
Limited Scope:																
Baton Rouge AA	5	7.58	19.39	20.00	17.46	0.00	37.57	60.00	25.58	20.00	0.00	0.00	0.00	0.00	0.00	
Lafayette AA	2	3.03	1.34	0.00	5.62	0.00	21.60	50.00	71.44	50.00	7.14	0.00	0.00	0.00	12.50	
Lake Charles AA	0	0.00	3.99	0.00	31.33	0.00	40.98	0.00	23.71	0.00	0.00	0.00	0.00	0.00	0.00	
Houma AA	1	1.52	0.00	0.00	4.82	0.00	70.09	100.00	25.09	0.00	0.00	0.00	0.00	0.00	0.00	
Morgan City AA	7	10.61	0.00	0.00	14.06	0.00	53.71	57.14	32.23	42.86	0.00	0.00	0.00	0.00	0.00	
<b>State of Texas</b>																
Full Scope: Houston AA	5	7.58	10.14	0.00	34.65	20.00	32.55	60.00	22.66	20.00	0.00	0.00	0.00	0.00	0.00	
<b>State of Mississippi</b>																
Full Scope: Gulfport AA	3	4.55	3.42	0.00	8.05	33.33	74.97	66.67	13.55	0.00	5.00	0.00	33.33	0.00	0.00	
<b>State of Alabama</b>																
Full Scope: Mobile AA	0	0.00	7.44	0.00	11.73	0.00	51.72	0.00	29.11	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Scope:																
Montgomery AA	0	0.00	20.62	0.00	7.20	0.00	39.05	0.00	33.14	0.00	0.00	0.00	0.00	0.00	0.00	
Greenville AA	0	0.00	0.00	0.00	87.61	0.00	6.84	0.00	5.56	0.00	0.00	0.00	0.00	0.00	0.00	
<b>State of Florida</b>																
Full Scope: Pensacola AA	1	1.52	5.99	0.00	6.97	0.00	43.43	0.00	43.61	100.0	0.00	0.00	0.00	0.00	0.00	
Limited Scope: Fort Walton Beach/Destin	0	0.00	0.00	0.00	13.50	0.00	76.74	0.00	9.76	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased by the bank.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: ALL									Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>State of Louisiana</b>															
Full Scope: New Orleans AA	20,003	55.52	8.36	8.17	20.60	20.54	33.34	28.61	37.69	42.68	12.93	15.93	15.08	11.85	13.92
Limited Scope:															
Baton Rouge AA	2,849	7.91	8.43	6.32	12.48	10.32	41.76	37.49	37.34	45.88	4.70	3.59	4.39	4.99	5.43
Lafayette AA	2,093	5.81	3.00	3.77	5.49	4.87	30.53	24.80	60.98	66.56	5.62	10.17	10.11	6.39	6.00
Lake Charles AA	1,072	2.98	4.64	1.96	21.70	18.66	48.79	38.62	24.87	40.76	7.60	3.51	8.86	6.37	10.95
Houma AA	1,060	2.94	0.00	0.00	9.96	12.64	71.72	63.02	17.80	24.34	7.05	0.00	8.96	7.61	7.76
Morgan City MA	1,684	4.67	0.00	0.00	10.70	0.65	50.60	53.15	38.69	46.20	9.82	0.00	0.00	14.61	8.79
<b>State of Texas</b>															
Full Scope: Houston AA	1,354	3.76	5.94	5.36	25.11	20.98	29.88	30.43	38.80	43.23	0.81	0.83	0.71	0.77	1.03
<b>State of Mississippi</b>															
Full Scope: Gulfport AA	549	1.52	7.71	9.47	15.97	16.58	65.21	58.83	11.10	15.12	1.68	1.50	2.77	1.36	2.78
<b>State of Alabama</b>															
Full Scope: Mobile AA	3,145	8.73	5.75	8.58	8.23	8.58	57.23	46.14	26.42	36.71	3.67	9.86	4.59	2.93	4.61
Limited Scope:															
Montgomery AA	758	2.10	16.28	8.71	14.77	7.65	31.71	26.65	37.24	56.99	2.86	1.98	1.79	3.53	3.39
Greenville AA	71	0.20	0.00	0.00	40.57	32.39	19.09	40.85	40.33	26.76	1.39	0.00	2.07	1.71	0.00
<b>State of Florida</b>															
Full Scope: Pensacola AA	1,339	3.72	7.22	17.07	11.76	20.23	58.79	41.10	19.76	21.60	2.27	4.40	2.77	1.84	1.99
Limited Scope: Fort Walton Beach/Destin	53	0.15	0.00	0.00	11.63	11.32	73.62	86.79	14.75	1.89	0.23	0.00	0.16	0.29	0.00

\* Based on 2001 Peer Small Business Data: US&PR.

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased by the bank.

\*\*\* Source Data - Dun and Bradstreet (2002).



Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: ALL								Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002					
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>State of Louisiana</b>																
Full Scope: New Orleans AA	53	21.72	2.59	0.00	17.77	50.94	44.69	24.53	34.94	24.53	4.12	0.00	3.70	3.70	8.00	
Limited Scope:																
Baton Rouge AA	13	5.33	4.10	23.08	8.73	15.38	41.18	53.85	45.99	7.69	8.82	0.00	0.00	18.75	0.00	
Lafayette AA	11	4.51	1.38	0.00	1.38	0.00	37.02	18.18	60.21	81.82	3.70	0.00	0.00	0.00	4.35	
Lake Charles AA	3	1.23	0.44	66.67	16.74	0.00	58.15	33.33	24.67	0.00	0.00	0.00	0.00	0.00	0.00	
Houma AA	36	14.75	0.00	0.00	11.85	36.11	70.74	44.44	17.04	19.44	28.57	0.00	50.00	12.50	33.33	
Morgan City AA	28	11.48	0.00	0.00	3.93	0.00	56.74	60.71	39.33	39.29	5.05	0.00	0.00	4.48	6.67	
<b>State of Texas</b>																
Full Scope: Houston AA	4	1.64	3.84	0.00	19.38	25.00	35.45	0.00	41.30	75.00	3.13	0.00	6.67	0.00	5.08	
<b>State of Mississippi</b>																
Full Scope: Gulfport AA	28	11.48	2.26	0.00	9.50	3.57	80.54	85.71	7.69	10.71	38.71	60.00	75.00	21.05	66.67	
<b>State of Alabama</b>																
Full Scope: Mobile AA	29	11.89	2.97	0.00	3.68	82.76	73.37	10.34	19.41	6.90	10.62	0.00	100.00	0.00	8.33	
Limited Scope:																
Montgomery AA	21	8.61	3.86	0.00	20.00	33.33	39.30	52.38	36.84	14.29	6.74	0.00	6.76	8.86	0.00	
Greenville AA	11	4.51	0.00	0.00	41.46	54.55	43.90	45.45	14.63	0.00	1.75	0.00	0.00	2.78	0.00	
<b>State of Florida</b>																
Full Scope: Pensacola AA	7	2.87	2.10	0.00	7.48	42.86	72.18	42.86	17.98	14.29	0.00	0.00	0.00	0.00	0.00	
Limited Scope: Fort Walton Beach/Destin	0	0.00	0.00	0.00	7.53	0.00	80.33	0.00	12.13	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2001 Peer Small Business Data: US&amp;PR.

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased by the bank.

\*\*\* Source Data - Dun and Bradstreet (2002).

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

Borrower Distribution: HOME PURCHASE		Geography: ALL								Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>†</sup>				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>State of Louisiana</b>															
Full Scope: New Orleans AA	3,284	45.36	24.88	7.90	15.58	18.82	18.74	21.04	40.80	52.25	3.47	3.44	3.85	3.37	3.38
Limited Scope:															
Baton Rouge AA	998	13.78	23.59	12.65	15.54	24.90	20.02	21.56	40.84	40.89	1.98	3.12	1.78	1.32	2.24
Lafayette AA	312	4.31	19.35	7.84	12.66	18.63	16.04	22.55	51.95	50.98	1.45	1.89	1.80	1.09	1.49
Lake Charles AA	137	1.89	23.79	9.84	16.25	27.87	19.26	27.05	40.69	35.25	1.37	1.70	2.12	1.89	0.69
Houma AA	571	7.89	24.14	5.11	15.31	15.32	19.66	23.77	40.89	55.81	3.66	1.11	2.22	4.07	4.14
Morgan City AA	246	3.40	21.11	3.81	14.72	11.44	16.50	19.92	47.67	64.83	3.04	0.00	1.79	2.91	3.38
<b>State of Texas</b>															
Full Scope: Houston AA	121	1.67	23.16	9.17	16.84	11.01	20.14	15.60	39.87	64.22	0.08	0.07	0.05	0.04	0.12
<b>State of Mississippi</b>															
Full Scope: Gulfport AA	327	4.52	22.82	1.86	17.54	11.76	21.31	22.91	38.33	63.47	1.33	0.44	1.23	1.07	1.69
<b>State of Alabama</b>															
Full Scope: Mobile AA	581	8.02	22.99	18.82	16.63	21.68	19.98	15.23	40.40	44.27	1.06	3.41	1.45	0.57	0.72
Limited Scope:															
Montgomery AA	71	0.98	22.63	5.97	16.03	14.93	20.63	26.87	40.71	52.24	0.46	0.47	0.17	0.91	0.35
Greenville AA	28	0.39	30.34	18.52	14.91	14.81	21.85	22.22	32.90	44.44	2.05	4.35	0.00	0.00	4.00
<b>State of Florida</b>															
Full Scope: Pensacola AA	491	6.78	20.52	8.47	18.10	21.07	21.88	18.60	39.49	51.86	0.87	1.14	1.09	0.69	0.82
Limited Scope: Fort Walton Beach/Destin	73	1.01	14.93	16.67	20.10	31.94	23.18	12.50	41.79	38.89	0.71	2.21	1.69	0.61	0.26

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* As a percentage of loans with borrower income information available. No information was available for 2.43% of loans originated and purchased by the bank.

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

\*\*\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased by the bank.

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: ALL						Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>†</sup>				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>State of Louisiana</b>															
Full Scope: New Orleans AA	5,644	56.47	24.88	6.97	15.58	13.98	18.74	20.67	40.80	58.38	17.53	15.50	15.24	16.11	19.32
Limited Scope:															
Baton Rouge AA	839	8.39	23.59	7.39	15.54	15.05	20.02	23.67	40.84	53.90	6.98	7.33	5.94	5.74	8.11
Lafayette AA	549	5.49	19.35	6.31	12.66	9.27	16.04	17.95	51.95	66.47	8.88	7.25	7.00	8.62	9.54
Lake Charles AA	392	3.92	23.79	8.63	16.25	16.29	19.26	25.24	40.69	49.84	10.53	7.69	11.92	9.85	11.00
Houma AA	746	7.46	24.14	7.06	15.31	12.56	19.66	24.18	40.89	56.20	12.40	11.49	11.84	11.74	12.91
Morgan City AA	605	6.05	21.11	3.33	14.72	11.35	16.50	22.50	47.67	62.82	11.28	12.00	8.05	11.11	11.88
<b>State of Texas</b>															
Full Scope: Houston AA	147	1.47	23.16	23.58	16.84	16.26	20.14	17.89	39.87	42.28	0.63	1.23	0.34	0.48	0.65
<b>State of Mississippi</b>															
Full Scope: Gulfport	429	4.29	22.82	11.41	17.54	15.22	21.31	26.90	38.33	46.47	4.58	4.17	2.50	5.20	5.64
<b>State of Alabama</b>															
Full Scope: Mobile AA	351	3.51	22.99	5.78	16.63	15.20	19.98	27.66	40.40	51.37	4.31	1.29	3.17	6.73	4.23
Limited Scope:															
Montgomery AA	52	0.52	22.63	20.83	16.03	16.67	20.63	16.67	40.71	45.83	3.44	3.08	6.02	3.23	2.56
Greenville AA	96	0.96	30.34	20.93	14.91	20.93	21.85	24.42	32.90	33.72	17.70	17.24	15.15	11.11	29.17
<b>State of Florida</b>															
Full Scope: Pensacola AA	142	1.42	20.52	8.76	18.10	13.87	21.88	26.28	39.49	51.09	2.73	3.85	1.99	2.27	2.96
Limited Scope: Fort Walton Beach/Destin	3	0.03	14.93	0.00	20.10	0.00	23.18	0.00	41.79	100.00	0.41	0.00	0.00	0.00	0.84

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* As a percentage of loans with borrower income information available. No information was available for 11.82% of loans originated and purchased by the bank.

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

\*\*\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased by the bank.

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: ALL						Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>†</sup>				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>State of Louisiana</b>															
Full Scope: New Orleans AA	4,584	48.97	24.88	2.26	15.58	11.08	18.74	19.17	40.80	67.49	4.67	2.03	4.16	4.43	5.14
Limited Scope:															
Baton Rouge AA	1,163	12.42	23.59	2.93	15.54	10.66	20.02	21.94	40.84	64.48	2.41	1.00	1.50	2.52	2.82
Lafayette AA	333	3.56	19.35	0.93	12.66	6.19	16.04	16.41	51.95	76.47	2.52	0.00	1.14	3.00	2.70
Lake Charles AA	215	2.30	23.79	1.73	16.25	8.09	19.26	16.76	40.69	73.41	1.55	0.58	0.93	1.53	1.80
Houma AA	757	8.09	24.14	1.47	15.31	7.35	19.66	19.25	40.89	71.93	3.78	1.61	2.99	3.56	4.15
Morgan City AA	310	3.31	21.11	1.37	14.72	7.51	16.50	12.63	47.67	78.50	3.69	2.56	3.27	2.06	4.10
<b>State of Texas</b>															
Full Scope: Houston AA	62	0.66	23.16	8.77	16.84	14.04	20.14	8.77	39.87	68.42	0.05	0.09	0.02	0.03	0.07
<b>State of Mississippi</b>															
Full Scope: Gulfport AA	457	4.88	22.82	3.87	17.54	9.11	21.31	22.32	38.33	64.69	2.27	2.69	1.47	2.11	2.55
<b>State of Alabama</b>															
Full Scope: Mobile AA	758	8.10	22.99	2.16	16.63	9.58	19.98	18.89	40.40	69.37	0.90	0.46	0.53	0.89	1.08
Limited Scope:															
Montgomery AA	188	2.01	22.63	7.74	16.03	16.67	20.63	27.98	40.71	47.62	1.91	1.05	2.20	1.95	1.94
Greenville AA	46	0.49	30.34	15.22	14.91	13.04	21.85	21.74	32.90	50.00	7.91	21.43	0.00	5.56	9.52
<b>State of Florida</b>															
Full Scope: Pensacola AA	447	4.78	20.52	2.58	18.10	9.86	21.88	18.78	39.49	68.78	1.42	1.25	0.94	1.01	1.80
Limited Scope: Fort Walton Beach/Destin	41	0.44	14.93	8.57	20.10	11.43	23.18	34.29	41.79	45.71	0.20	0.00	0.00	0.64	0.11

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* As a percentage of loans with borrower income information available. No information was available for 3.88% of loans originated and purchased by the bank.

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

\*\*\*\* Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: ALL				Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>*</sup>		
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>State of Louisiana</b>										
Full Scope: New Orleans AA	20,003	55.52	69.58	57.48	73.51	14.90	11.59	12.93	14.67	
Limited Scope: Baton Rouge AA	2,849	7.91	67.49	59.71	74.90	15.44	9.65	4.70	5.58	
Lafayette AA	2,093	5.81	69.36	65.07	75.78	13.81	10.42	5.62	5.33	
Lake Charles AA	1,072	2.98	70.69	78.26	78.45	13.71	7.84	7.60	11.58	
Houma AA	1,060	2.94	70.93	58.30	71.04	15.09	13.87	7.05	6.76	
Morgan City AA	1,684	4.67	69.59	61.28	77.43	12.95	9.62	9.82	9.27	
<b>State of Texas</b>										
Full Scope: Houston AA	1,354	3.76	66.68	55.24	64.99	18.46	16.54	0.81	1.09	
<b>State of Mississippi</b>										
Full Scope: Gulfport AA	549	1.52	74.45	67.76	81.06	8.93	10.02	1.68	2.13	
<b>State of Alabama</b>										
Full Scope: Mobile AA	3,145	8.73	79.68	48.84	67.06	18.98	13.96	3.67	3.68	
Limited Scope: Montgomery AA	758	2.10	80.45	57.78	78.50	11.87	9.63	2.86	4.35	
Greenville AA	71	0.20	84.37	57.75	78.87	15.49	5.63	1.39	1.52	
<b>State of Florida</b>										
Full Scope: Pensacola AA	1,339	3.72	70.20	48.77	63.78	20.76	15.46	2.27	2.77	
Limited Scope: Fort Walton Beach/Destin	53	0.15	67.57	62.26	39.62	26.42	33.96	0.23	0.36	

\* Based on 2001 Peer Small Business Data: US&PR.

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased by the bank.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 6.53% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: ALL				Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>State of Louisiana</b>										
Full Scope: New Orleans AA	53	21.72	91.72	79.25	64.15	18.87	16.98	4.12	3.39	
Limited Scope: Baton Rouge AA	13	5.33	91.98	61.54	46.15	23.08	30.77	8.82	7.41	
Lafayette AA	11	4.51	91.35	100.00	54.55	36.36	9.09	3.70	5.56	
Lake Charles AA	3	1.23	94.27	100.00	100.00	0.00	0.00	0.00	0.00	
Houma AA	36	14.75	92.96	91.67	83.33	11.11	5.56	28.57	27.78	
Morgan City AA	28	11.48	82.58	82.14	75.00	7.14	17.86	5.05	4.65	
<b>State of Texas</b>										
Full Scope: Houston AA	4	1.64	91.01	25.00	75.00	25.00	0.00	3.13	1.19	
<b>State of Mississippi</b>										
Full Scope: Gulfport AA	28	11.48	96.83	100.00	64.29	10.71	25.00	38.71	42.31	
<b>State of Alabama</b>										
Full Scope: Mobile AA	29	11.89	90.08	89.66	6.90	24.14	68.97	10.62	10.31	
Limited Scope: Montgomery AA	21	8.61	90.53	38.10	80.95	9.52	9.52	6.74	3.01	
Greenville AA	11	4.51	95.12	36.36	72.73	18.18	9.09	1.75	0.00	
<b>State of Florida</b>										
Full Scope: Pensacola AA	7	2.87	95.28	71.43	71.43	28.57	0.00	0.00	0.00	
Limited Scope: Fort Walton Beach/Destin	0	0.00	92.47	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2001 Peer Small Business Data: US&amp;PR.

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased by the bank.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&amp;B - 2002).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 9.84% of small loans to farms originated and purchased by the bank.

Table 13 – Consumer Loans omitted as not applicable.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: ALL									
Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$	#	\$(000's)
<b>State of Louisiana</b>									
Full Scope: New Orleans AA	2	512	326	8,421	328	8,933	41.63	0	0
Limited Scope:									
Baton Rouge AA	1	82	82	1,992	83	2,074	9.66	0	0
Lafayette AA	1	40	64	570	65	610	2.84	0	0
Lake Charles AA	1	35	26	217	27	252	1.17	0	0
Houma AA	1	59	28	1,090	29	1,149	5.35	0	0
Morgan City AA	1	40	21	217	22	238	1.11	0	0
<b>State of Texas</b>									
Full Scope: Houston AA	1	80	37	4,058	38	4,138	19.28	0	0
<b>State of Mississippi</b>									
Full Scope: Gulfport AA	1	37	42	1,398	43	1,435	6.69	0	0
<b>State of Alabama</b>									
Full Scope: Mobile AA	1	39	42	571	43	610	2.84	0	0
Limited Scope:									
Montgomery AA	1	28	13	1,851	14	1,879	8.76	0	0
Greenville AA	1	17	7	125	8	142	0.66	0	0
<b>State of Florida</b>									
Full Scope: Pensacola AA	1	31	29	180	30	211	.98	0	0
Limited Scope: Fort Walton Beach/Destin	N/A	N/A	0	0	0	0	0	0	0

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

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.



Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: ALL				Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 2002					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of BANK Deposits in AA	# of BANK Branches	% of BANK Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>State of Louisiana</b>																	
Full Scope: New Orleans AA	51.2	39	31.2	7.69	20.51	25.64	46.15	9	3	0	0	+3	+3	11.73	21.20	35.64	31.55
Limited Scope:																	
Baton Rouge AA	8.2	15	12.0	0.00	13.33	33.33	53.33	3	5	0	0	0	-2	11.78	16.95	41.06	30.21
Lafayette AA	4.0	6	4.8	0.00	16.67	33.33	50.00	1	1	0	0	0	0	6.38	8.56	27.23	57.83
Lake Charles AA	3.5	7	5.6	0.00	0.00	42.86	57.14	0	0	0	0	0	0	6.60	16.04	50.94	26.38
Houma AA	5.9	9	7.2	0.00	11.11	66.67	22.22	0	1	0	0	0	-1	0.00	10.44	74.47	14.75
Morgan City AA	4.0	7	5.6	0.00	14.29	28.57	57.14	2	3	0	+1	-2	0	0.00	11.82	51.13	37.05
<b>State of Texas</b>																	
Full Scope: Houston AA	8.0	9	7.2	22.22	33.33	33.33	11.11	1	0	0	0	+1	0	9.07	28.71	32.36	29.86
<b>State of Mississippi</b>																	
Full Scope: Gulfport AA	3.7	8	6.4	12.50	12.50	50.00	25.00	0	3	0	-1	-2	0	2.03	12.99	73.53	11.44
<b>State of Alabama</b>																	
Full Scope: Mobile AA	3.9	11	8.0	0.00	0.00	70.00	30.00	6	3	0	0	+2	+2	10.66	11.53	52.75	24.59
Limited Scope:																	
Montgomery AA	2.8	5	4.0	0.00	40.00	0.00	60.00	2	0	0	0	0	+2	10.25	18.12	43.72	27.90
Greenville AA	1.7	3	2.4	0.00	66.67	0.00	33.33	0	0	0	0	0	0	0.00	56.42	36.61	6.98
<b>State of Florida</b>																	
Full Scope: Pensacola AA	3.1	6	4.0	0.00	0.00	100.0	0.00	5	2	0	-1	+3	+1	4.08	12.26	62.68	20.74
Limited Scope: Fort Walton Beach/Destin	0.1	2	1.6	0.00	0.00	100.0	0.00	2	0	0	0	+2	0	0.00	17.71	61.56	20.73

## Tables of Performance Data 1999-2002

**Table 1. Lending Volume**

LENDING VOLUME												Geography: Whitney 99-2002		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002	
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
<b>State of Louisiana</b>															
Full Scope: New Orleans AA	51.21	9,099	825,811	12,580	1,458,261	38	4,284	203	104,849	21,920	2,393,205	51.21			
Limited Scope: Baton Rouge AA	9.61	2,037	188,912	1,967	212,807	7	757	102	29,163	4,113	431,639	8.23			
Lafayette AA	4.59	782	57,093	1,153	148,289	8	1,050	20	10,510	1,963	216,942	4.04			
Lake Charles AA	3.61	617	29,864	905	90,345	1	50	24	56,982	1,547	177,241	3.51			
Houma AA	5.19	1,408	76,907	781	94,910	22	1,405	10	733	2,221	173,955	5.86			
Morgan City AA	4.07	734	32,894	970	97,987	20	1,737	16	20,142	1,740	152,760	4.00			
<b>State of Texas</b>															
Full Scope: Houston AA	3.98	335	38,849	1,335	193,800	4	226	31	54,933	1,705	287,808	8.02			
<b>State of Mississippi</b>															
Full Scope: Gulfport AA	2.98	840	61,175	404	39,070	23	3,241	8	708	1,275	104,194	3.68			
<b>State of Alabama</b>															
Full Scope: Mobile AA	7.44	1,214	122,722	1,931	261,525	27	9,038	14	4,545	3,186	397,830	3.87			
Limited Scope: Montgomery AA	2.17	287	26,533	585	45,456	19	1,161	38	20,886	929	94,036	2.78			
Greenville AA	0.60	164	4,669	70	6,809	11	1,016	10	7,826	255	20,320	1.69			
<b>State of Florida</b>															
Full Scope: Pensacola	4.19	865	92,585	906	124,684	4	215	17	6,757	1,792	224,241	3.08			
Limited Scope: Fort Walton Beach/Destin	0.36	111	15,909	44	9,652	0	0	0	0	155	25,561	.05			

\* Loan Data as of December 31, 2002.

\*\* The evaluation period for Community Development Loans is From January 01, 1999 to December 31, 2002.

\*\*\* Deposit Data as of June 30, 2001.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: WHITNEY 99-2002				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography <sup>†</sup>				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>State of Louisiana</b>																
Full Scope: New Orleans AA	2,192	44.28	4.71	2.69	17.11	9.53	40.30	34.40	37.88	53.38	2.65	1.76	1.98	2.53	3.04	
Limited Scope: Baton Rouge AA	639	12.91	7.06	3.76	15.90	5.32	42.09	40.53	34.95	50.39	1.63	3.45	1.19	1.38	1.92	
Lafayette AA	201	4.06	5.07	3.48	7.57	7.96	26.54	17.41	60.82	71.14	1.25	3.13	2.86	0.63	1.33	
Lake Charles AAS	127	2.57	4.81	0.79	14.20	6.30	52.16	51.97	28.84	40.94	1.43	0.00	1.06	1.02	2.00	
Houma AA	327	6.61	0.00	0.00	9.10	8.87	75.92	59.33	14.97	31.80	3.17	0.00	3.82	2.97	3.50	
Morgan City AA	130	2.63	0.00	0.00	9.14	3.08	51.60	49.23	39.26	47.69	2.48	0.00	1.85	2.29	2.71	
<b>State of Texas</b>																
Full Scope: Houston AA	121	2.44	5.76	5.79	22.64	14.88	32.26	25.62	39.34	53.72	0.07	0.19	0.09	0.06	0.08	
<b>State of Mississippi</b>																
Full Scope: Gulfport AA	218	4.40	1.28	0.00	11.40	9.63	73.01	58.72	14.31	31.65	1.07	0.00	1.73	1.08	0.83	
<b>State of Alabama</b>																
Full Scope: Mobile AA	438	8.85	6.22	4.79	9.56	7.31	57.42	54.57	26.80	33.33	0.99	3.15	3.37	0.85	0.91	
Limited Scope: Montgomery AA	60	1.21	4.94	0.00	17.56	15.00	44.13	40.00	33.37	45.00	0.41	0.00	1.07	0.61	0.17	
Greenville AA	27	0.55	0.00	0.00	51.50	48.15	39.50	25.93	9.00	25.93	1.69	0.00	2.25	0.00	2.38	
<b>State of Florida</b>																
Full Scope: Pensacola AA	402	8.12	3.05	2.74	10.54	2.74	63.69	55.97	22.72	38.56	0.76	2.78	0.38	0.63	1.12	
Limited Scope: Fort Walton Beach/Destin AA	68	1.37	0.00	0.00	7.71	10.29	68.72	77.94	23.57	11.76	0.61	0.00	2.42	0.59	0.27	

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased by the bank.

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

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

Geographic Distribution: HOME IMPROVEMENT															Geography: WHITNEY 99-2002				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>State of Louisiana</b>																								
Full Scope: New Orleans AA	3,419	52.75	4.71	4.71	17.11	13.60	40.30	36.09	37.88	45.60	18.21	18.72	16.67	16.42	20.73									
Limited Scope: Baton Rouge AA	533	8.53	7.06	5.24	15.90	9.04	42.09	47.92	34.95	37.79	7.18	10.34	7.30	6.46	7.63									
Lafayette AA	313	4.83	5.07	2.24	7.57	2.56	26.54	16.29	60.82	78.91	9.09	10.00	4.55	6.28	10.57									
Lake Charles AA	324	5.00	4.81	1.23	14.20	10.49	52.16	51.54	28.84	36.73	10.65	9.09	12.75	10.53	10.28									
Houma AA	564	8.70	0.00	0.00	9.10	8.87	75.92	70.92	14.97	20.21	13.29	0.00	14.71	12.56	15.56									
Morgan City AA	367	5.66	0.00	0.00	9.14	5.18	51.60	55.86	39.26	38.96	12.68	0.00	16.67	16.18	8.86									
<b>State of Texas</b>																								
Full Scope: Houston AA	147	2.27	5.76	25.17	22.64	25.85	32.26	21.09	39.34	27.89	0.79	4.38	1.21	0.50	0.44									
<b>State of Mississippi</b>																								
Full Scope: Gulfport AA	290	4.47	1.28	1.38	11.40	13.10	73.01	71.03	14.31	14.48	5.43	6.25	7.52	4.62	8.66									
<b>State of Alabama</b>																								
Full Scope: Mobile AA	241	3.72	6.22	2.49	9.56	2.07	57.42	58.09	26.80	37.34	4.53	5.00	0.00	3.82	7.12									
Limited Scope: Montgomery AA	52	0.80	4.94	1.92	17.56	26.92	44.13	40.38	33.37	30.77	3.31	0.00	6.32	3.80	1.64									
Greenville AA	91	1.40	0.00	0.00	51.50	47.25	39.50	38.46	9.00	14.29	18.10	0.00	14.29	26.09	25.00									
<b>State of Florida</b>																								
Full Scope: Pensacola AA	118	1.82	3.05	2.54	10.54	10.17	63.69	55.08	22.72	32.20	2.54	12.50	2.33	2.12	3.23									
Limited Scope: Fort Walton Beach/Destin	3	0.05	0.00	0.00	7.71	33.33	68.72	33.33	23.57	33.33	0.73	0.00	7.14	0.00	1.33									

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased by the bank.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: WHITNEY 99-2002					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>State of Louisiana</b>																
Full Scope: New Orleans AA	3,453	49.29	4.71	1.88	17.11	6.95	40.30	32.00	37.88	59.17	3.76	2.13	2.27	3.10	4.79	
Limited Scope: Baton Rouge AA	841	12.01	7.06	1.19	15.90	4.28	42.09	43.16	34.95	51.37	2.07	1.35	0.62	2.08	2.43	
Lafayette AA	266	3.80	5.07	0.75	7.57	3.38	26.54	12.78	60.82	83.08	2.04	0.00	1.15	1.18	2.35	
Lake Charles AA	166	2.37	4.81	0.00	14.20	6.02	52.16	42.77	28.84	51.20	1.40	0.00	0.99	1.32	1.68	
Houma AA	517	7.38	0.00	0.00	9.10	5.42	75.92	64.02	14.97	30.56	3.43	0.00	2.73	3.34	3.81	
Morgan City AA	231	3.30	0.00	0.00	9.14	1.30	51.60	48.48	39.26	50.22	2.84	0.00	1.94	3.47	2.41	
<b>State of Texas</b>																
Full Scope: Houston AA	62	0.89	5.76	3.23	22.64	27.42	32.26	24.19	39.34	45.16	0.04	0.11	0.11	0.05	0.02	
<b>State of Mississippi</b>																
Full Scope: Gulfport AA	329	4.70	1.28	0.00	11.40	11.25	73.01	67.78	14.31	20.97	1.97	0.00	2.48	1.86	2.28	
<b>State of Alabama</b>																
Full Scope: Mobile AA	535	7.64	6.22	0.56	9.56	2.24	57.42	50.09	26.80	47.10	0.78	0.61	0.00	0.71	1.03	
Limited Scope: Montgomery AA	175	2.50	4.94	0.00	17.56	13.71	44.13	44.00	33.37	42.29	1.52	0.00	1.77	2.00	1.19	
Greenville AA	46	0.66	0.00	0.00	51.50	56.52	39.50	13.04	9.00	30.43	5.98	0.00	7.78	2.17	6.25	
<b>State of Florida</b>																
Full Scope: Pensacola AA	344	4.91	3.05	2.62	10.54	2.62	63.69	61.92	22.72	32.85	1.23	2.50	0.93	1.23	1.24	
Limited Scope: Fort Walton Beach/Destin	40	0.57	0.00	0.00	7.71	5.00	68.72	82.50	23.57	12.50	0.17	0.00	0.61	0.17	0.10	

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Region.

\*\* Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased by the bank.

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY															
Geography: WHITNEY 99-2002															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>State of Louisiana</b>															
Full Scope: New Orleans AA	35	62.50	20.40	14.29	21.95	31.43	29.68	34.29	27.98	20.00	7.91	10.53	9.76	9.30	2.78
Limited Scope: Baton Rouge AA	4	7.14	19.39	0.00	17.46	0.00	37.57	75.00	25.58	25.00	0.00	0.00	0.00	0.00	0.00
Lafayette AA	2	3.57	1.34	0.00	5.62	0.00	21.60	50.00	71.44	50.00	7.14	0.00	0.00	0.00	12.50
Lake Charles AA	0	0.00	3.99	0.00	31.33	0.00	40.98	0.00	23.71	0.00	0.00	0.00	0.00	0.00	0.00
Houma AA	0	0.00	0.00	0.00	4.82	0.00	70.09	0.00	25.09	0.00	0.00	0.00	0.00	0.00	0.00
Morgan City AA	6	10.71	0.00	0.00	14.06	0.00	53.71	66.67	32.23	33.33	0.00	0.00	0.00	0.00	0.00
<b>State of Texas</b>															
Full Scope: Houston AA	5	8.93	10.14	0.00	34.65	20.00	32.55	60.00	22.66	20.00	0.00	0.00	0.00	0.00	0.00
<b>State of Mississippi</b>															
Full Scope: Gulfport AA	3	5.36	3.42	0.00	8.05	33.33	74.97	66.67	13.55	0.00	5.00	0.00	33.33	0.00	0.00
<b>State of Alabama</b>															
Full Scope: Mobile AA	0	0.00	7.44	0.00	11.73	0.00	51.72	0.00	29.11	0.00	0.00	0.00	0.00	0.00	0.00
Limited Scope: Montgomery AA	0	0.00	20.62	0.00	7.20	0.00	39.05	0.00	33.14	0.00	0.00	0.00	0.00	0.00	0.00
Greenville AA	0	0.00	0.00	0.00	87.61	0.00	6.84	0.00	5.56	0.00	0.00	0.00	0.00	0.00	0.00
<b>State of Florida</b>															
Full Scope: Pensacola AA	1	1.79	5.99	0.00	6.97	0.00	43.43	0.00	43.61	100.00	0.00	0.00	0.00	0.00	0.00
Limited Scope: Fort Walton Beach/Destin	0	0.00	0.00	0.00	13.50	0.00	76.74	0.00	9.76	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased by the bank.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: WHITNEY 99-2002		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses*	% BANK Loans	% of Businesses*	% BANK Loans	% of Businesses*	% BANK Loans	% of Businesses*	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>State of Louisiana</b>																					
Full Scope: New Orleans AA	12,580	53.24	8.36	7.93	20.60	21.13	33.34	29.07	37.69	41.87	12.93	15.93	15.08	11.85	13.92						
Limited Scope: Baton Rouge AA	1,967	8.32	8.43	5.64	12.48	10.17	41.76	38.74	37.34	45.45	4.70	3.59	4.39	4.99	5.43						
Lafayette AA	1,153	4.88	3.00	3.56	5.49	4.60	30.53	24.80	60.98	67.04	5.62	10.17	10.11	6.39	6.00						
Lake Charles AA	905	3.83	4.64	1.99	21.70	18.78	48.79	38.23	24.87	40.99	7.60	3.51	8.86	6.37	10.95						
Houma AA	781	3.30	0.00	0.00	9.96	12.55	71.72	62.74	17.80	24.71	7.05	0.00	8.96	7.61	7.76						
Morgan City MA	970	4.10	0.00	0.00	10.70	0.52	50.60	56.29	38.69	43.20	9.82	0.00	0.00	14.61	8.79						
<b>State of Texas</b>																					
Full Scope: Houston AA	1,335	5.65	5.94	5.28	25.11	21.18	29.88	30.44	38.80	43.10	0.81	0.83	0.71	0.77	1.03						
<b>State of Mississippi</b>																					
Full Scope: Gulfport AA	404	1.71	7.71	8.17	15.97	18.32	65.21	57.43	11.10	16.09	1.68	1.50	2.77	1.36	2.78						
<b>State of Alabama</b>																					
Full Scope: Mobile AA	1,931	8.17	5.75	8.34	8.23	7.97	57.23	45.91	26.42	37.78	3.67	9.86	4.59	2.93	4.61						
Limited Scope: Montgomery AA	585	2.48	16.28	7.86	14.77	8.72	31.71	28.89	37.24	54.53	2.86	1.98	1.79	3.53	3.39						
Greenville AA	70	0.30	0.00	0.00	40.57	32.86	19.09	41.43	40.33	25.71	1.39	0.00	2.07	1.71	0.00						
<b>State of Florida</b>																					
Full Scope: Pensacola AA	906	3.83	7.22	17.29	11.76	17.65	58.79	44.06	19.76	21.01	2.27	4.40	2.77	1.84	1.99						
Limited Scope: Fort Walton Beach/Destin	44	0.19	0.00	0.00	11.63	9.09	73.62	90.91	14.75	0.00	0.23	0.00	0.16	0.29	0.00						

\* Based on 2001 Peer Small Business Data: US&PR.

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased by the bank.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: WHITNEY 99-2002															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>State of Louisiana</b>															
Full Scope: New Orleans AA	38	20.65	2.59	0.00	17.77	55.26	44.69	26.32	34.94	18.42	4.12	0.00	3.70	3.70	8.00
Limited Scope: Baton Rouge AA	7	3.80	4.10	0.00	8.73	14.29	41.18	71.43	45.99	14.29	8.82	0.00	0.00	18.75	0.00
Lafayette AA	8	4.35	1.38	0.00	1.38	0.00	37.02	12.50	60.21	87.50	3.70	0.00	0.00	0.00	4.35
Lake Charles AA	1	0.54	0.44	0.00	16.74	0.00	58.15	100.00	24.67	0.00	0.00	0.00	0.00	0.00	0.00
Houma AA	22	11.96	0.00	0.00	11.85	36.36	70.74	36.36	17.04	27.27	28.57	0.00	50.00	12.50	33.33
Morgan City AA	20	10.87	0.00	0.00	3.93	0.00	56.74	65.00	39.33	35.00	5.05	0.00	0.00	4.48	6.67
<b>State of Texas</b>															
Full Scope: Houston AA	4	2.17	3.84	0.00	19.38	25.00	35.45	0.00	41.30	75.00	3.13	0.00	6.67	0.00	5.08
<b>State of Mississippi</b>															
Full Scope: Gulfport AA	23	12.50	2.26	0.00	9.50	4.35	80.54	82.61	7.69	13.04	38.71	60.00	75.00	21.05	66.67
<b>State of Alabama</b>															
Full Scope: Mobile AA	27	14.67	2.97	0.00	3.68	85.19	73.37	7.41	19.41	7.41	10.62	0.00	100.00	0.00	8.33
Limited Scope: Montgomery AA	19	10.33	3.86	0.00	20.00	36.84	39.30	52.63	36.84	10.53	6.74	0.00	6.76	8.86	0.00
Greenville AA	11	5.98	0.00	0.00	41.46	54.55	43.90	45.45	14.63	0.00	1.75	0.00	0.00	2.78	0.00
<b>State of Florida</b>															
Full Scope: Pensacola AA	4	2.17	2.10	0.00	7.48	50.00	72.18	25.00	17.98	25.00	0.00	0.00	0.00	0.00	0.00
Limited Scope: Fort Walton Beach/Destin	0	0.00	0.00	0.00	7.53	0.00	80.33	0.00	12.13	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2001 Peer Small Business Data: US&amp;PR.

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased by the bank.

\*\*\* Source Data - Dun and Bradstreet (2002).



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

Borrower Distribution: HOME PURCHASE															Geography: WHITNEY 99-2002					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>†</sup>													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
<b>State of Louisiana</b>																								
Full Scope: New Orleans AA	2,192	44.28	24.88	6.18	15.58	17.50	18.74	22.26	40.80	54.06	3.47	3.44	3.85	3.37	3.38									
Limited Scope: Baton Rouge AA	639	12.91	23.59	12.38	15.54	22.70	20.02	21.27	40.84	43.65	1.98	3.12	1.78	1.32	2.24									
Lafayette AA	201	4.06	19.35	5.61	12.66	17.35	16.04	22.45	51.95	54.59	1.45	1.89	1.80	1.09	1.49									
Lake Charles AA	127	2.57	23.79	10.08	16.25	28.57	19.26	26.05	40.69	35.29	1.37	1.70	2.12	1.89	0.69									
Houma AA	327	6.61	24.14	4.92	15.31	16.00	19.66	22.15	40.89	56.92	3.66	1.11	2.22	4.07	4.14									
Morgan City AA	130	2.63	21.11	3.33	14.72	9.17	16.50	16.67	47.67	70.83	3.04	0.00	1.79	2.91	3.38									
<b>State of Texas</b>																								
Full Scope: Houston AA	121	2.44	23.16	9.17	16.84	11.01	20.14	15.60	39.87	64.22	0.08	0.07	0.05	0.04	0.12									
<b>State of Mississippi</b>																								
Full Scope: Gulfport AA	218	4.40	22.82	1.86	17.54	12.09	21.31	26.05	38.33	60.00	1.33	0.44	1.23	1.07	1.69									
<b>State of Alabama</b>																								
Full Scope: Mobile AA	438	8.85	22.99	22.46	16.63	25.06	19.98	16.31	40.40	36.17	1.06	3.41	1.45	0.57	0.72									
Limited Scope: Montgomery AA	60	1.21	22.63	7.14	16.03	16.07	20.63	28.57	40.71	48.21	0.46	0.47	0.17	0.91	0.35									
Greenville AA	27	0.55	30.34	19.23	14.91	15.38	21.85	19.23	32.90	46.15	2.05	4.35	0.00	0.00	4.00									
<b>State of Florida</b>																								
Full Scope: Pensacola AA	402	8.12	20.52	8.79	18.10	22.36	21.88	18.34	39.49	50.50	0.87	1.14	1.09	0.69	0.82									
Limited Scope: Fort Walton Beach/Destin	68	1.37	14.93	17.91	20.10	34.33	23.18	13.43	41.79	34.33	0.71	2.21	1.69	0.61	0.26									

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* As a percentage of loans with borrower income information available. No information was available for 2.43% of loans originated and purchased by the bank.

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

\*\*\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased by the bank.

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT															
Geography: WHITNEY 99-2002															
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>*</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>State of Louisiana</b>															
Full Scope: New Orleans AA	3,419	52.75	24.88	6.77	15.58	14.23	18.74	21.43	40.80	57.56	17.53	15.50	15.24	16.11	19.32
Limited Scope: Baton Rouge AA	533	8.53	23.59	8.69	15.54	14.55	20.02	24.44	40.84	52.32	6.98	7.33	5.94	5.74	8.11
Lafayette AA	313	4.83	19.35	5.92	12.66	8.71	16.04	18.47	51.95	66.90	8.88	7.25	7.00	8.62	9.54
Lake Charles AA	324	5.00	23.79	8.72	16.25	16.78	19.26	23.83	<b>40.69</b>	50.67	10.53	7.69	11.92	9.85	11.00
Houma AA	564	8.70	24.14	5.86	15.31	12.97	19.66	23.64	40.89	57.53	12.40	11.49	11.84	11.74	12.91
Morgan City AA	367	5.66	21.11	2.89	14.72	10.93	16.50	21.86	47.67	64.31	11.28	12.00	8.05	11.11	11.88
<b>State of Texas</b>															
Full Scope: Houston AA	147	2.27	23.16	23.58	16.84	16.26	20.14	17.89	39.87	42.28	0.63	1.23	0.34	0.48	0.65
<b>State of Mississippi</b>															
Full Scope: Gulfport	290	4.47	22.82	11.79	17.54	13.82	21.31	28.46	38.33	45.93	4.58	4.17	2.50	5.20	5.64
<b>State of Alabama</b>															
Full Scope: Mobile AA	241	3.72	22.99	4.85	16.63	15.42	19.98	30.40	40.40	49.34	4.31	1.29	3.17	6.73	4.23
Limited Scope: Montgomery AA	52	0.80	22.63	20.83	16.03	16.67	20.63	16.67	40.71	45.83	3.44	3.08	6.02	3.23	2.56
Greenville AA	91	1.40	30.34	19.51	14.91	20.73	21.85	25.61	32.90	34.15	17.70	17.24	15.15	11.11	29.17
<b>State of Florida</b>															
Full Scope: Pensacola AA	118	1.82	20.52	8.77	18.10	11.40	21.88	27.19	39.49	52.63	2.73	3.85	1.99	2.27	2.96
Limited Scope: Fort Walton Beach/Destin	3	0.05	14.93	0.00	20.10	0.00	23.18	0.00	41.79	100.00	0.41	0.00	0.00	0.00	0.84

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* As a percentage of loans with borrower income information available. No information was available for 11.82% of loans originated and purchased by the bank.

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

\*\*\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased by the bank.

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: WHITNEY 99-2002				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share <sup>1</sup>				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>State of Louisiana</b>																
Full Scope: New Orleans AA	3,453	49.29	24.88	2.24	15.58	11.54	18.74	19.46	40.80	66.77	4.67	2.03	4.16	4.43	5.14	
Limited Scope: Baton Rouge AA	841	12.01	23.59	2.84	15.54	10.75	20.02	22.25	40.84	64.15	2.41	1.00	1.50	2.52	2.82	
Lafayette AA	266	3.80	19.35	1.17	12.66	4.67	16.04	17.90	51.95	76.26	2.52	0.00	1.14	3.00	2.70	
Lake Charles AA	166	2.37	23.79	1.88	16.25	8.13	19.26	17.50	40.69	72.50	1.55	0.58	0.93	1.53	1.80	
Houma AA	517	7.38	24.14	1.18	15.31	8.45	19.66	21.02	40.89	69.35	3.78	1.61	2.99	3.56	4.15	
Morgan City AA	231	3.30	21.11	1.38	14.72	6.91	16.50	12.90	47.67	78.80	3.69	2.56	3.27	2.06	4.10	
<b>State of Texas</b>																
Full Scope: Houston AA	62	0.89	23.16	8.77	16.84	14.04	20.14	8.77	39.87	68.42	0.05	0.09	0.02	0.03	0.07	
<b>State of Mississippi</b>																
Full Scope: Gulfport AA	329	4.70	22.82	4.75	17.54	10.13	21.31	23.10	38.33	62.03	2.27	2.69	1.47	2.11	2.55	
<b>State of Alabama</b>																
Full Scope: Mobile AA	535	7.64	22.99	2.50	16.63	9.62	19.98	20.00	40.40	67.88	0.90	0.46	0.53	0.89	1.08	
Limited Scope: Montgomery AA	175	2.50	22.63	8.39	16.03	17.42	20.63	29.03	40.71	45.16	1.91	1.05	2.20	1.95	1.94	
Greenville AA	46	0.66	30.34	15.22	14.91	13.04	21.85	21.74	32.90	50.00	7.91	21.43	0.00	5.56	9.52	
<b>State of Florida</b>																
Full Scope: Pensacola AA	344	4.91	20.52	3.41	18.10	11.15	21.88	19.50	39.49	65.94	1.42	1.25	0.94	1.01	1.80	
Limited Scope: Fort Walton Beach/Destin	40	0.57	14.93	8.82	20.10	11.76	23.18	35.29	41.79	44.12	0.20	0.00	0.00	0.64	0.11	

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* As a percentage of loans with borrower income information available. No information was available for 3.88% of loans originated and purchased by the bank.

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

\*\*\*\* Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased by the bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: WHITNEY 99-2002			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>State of Louisiana</b>									
Full Scope: New Orleans AA	12,580	53.24	69.58	49.77	71.84	16.02	12.14	12.93	14.67
Limited Scope: Baton Rouge AA	1,967	8.32	67.49	54.14	72.65	17.08	10.27	4.70	5.58
Lafayette AA	1,153	4.88	69.36	53.95	69.12	17.09	13.79	5.62	5.33
Lake Charles AA	905	3.83	70.69	76.46	76.91	14.92	8.18	7.60	11.58
Houma AA	781	3.30	70.93	55.57	70.55	16.65	12.80	7.05	6.76
Morgan City AA	970	4.10	69.59	55.46	74.85	13.71	11.44	9.82	9.27
<b>State of Texas</b>									
Full Scope: Houston AA	1,335	5.65	66.68	54.91	65.02	18.58	16.40	0.81	1.09
<b>State of Mississippi</b>									
Full Scope: Gulfport AA	404	1.71	74.45	71.04	77.97	9.90	12.13	1.68	2.13
<b>State of Alabama</b>									
Full Scope: Mobile AA	1,931	8.17	79.68	49.25	64.99	19.78	15.23	3.67	3.68
Limited Scope: Montgomery AA	585	2.48	80.45	58.12	80.51	11.79	7.69	2.86	4.35
Greenville AA	70	0.30	84.37	58.57	78.57	15.71	5.71	1.39	1.52
<b>State of Florida</b>									
Full Scope: Pensacola AA	906	3.83	70.20	52.43	63.36	21.08	15.56	2.27	2.77
Limited Scope: Fort Walton Beach/Destin	44	0.19	67.57	68.18	45.45	27.27	27.27	0.23	0.36

\* Based on 2001 Peer Small Business Data: US&PR.

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased by the bank.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 6.53% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: WHITNEY 99-2002			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>State of Louisiana</b>									
Full Scope: New Orleans AA	38	20.65	91.72	76.32	65.79	21.05	13.16	4.12	3.39
Limited Scope: Baton Rouge AA	7	3.80	91.98	71.43	71.43	14.29	14.29	8.82	7.41
Lafayette AA	8	4.35	91.35	100.00	50.00	50.00	0.00	3.70	5.56
Lake Charles AA	1	0.54	94.27	100.00	100.00	0.00	0.00	0.00	0.00
Houma AA	22	11.96	92.96	86.36	86.36	4.55	9.09	28.57	27.78
Morgan City AA	20	10.87	82.58	80.00	75.00	10.00	15.00	5.05	4.65
<b>State of Texas</b>									
Full Scope: Houston AA	4	2.17	91.01	25.00	75.00	25.00	0.00	3.13	1.19
<b>State of Mississippi</b>									
Full Scope: Gulfport AA	23	12.50	96.83	100.00	69.57	4.35	26.09	38.71	42.31
<b>State of Alabama</b>									
Full Scope: Mobile AA	27	14.67	90.08	92.59	3.70	22.22	74.07	10.62	10.31
Limited Scope: Montgomery AA	19	10.33	90.53	36.84	84.21	10.53	5.26	6.74	3.01
Greenville AA	11	5.98	95.12	36.36	72.73	18.18	9.09	1.75	0.00
<b>State of Florida</b>									
Full Scope: Pensacola AA	4	2.17	95.28	100.00	100.00	0.00	0.00	0.00	0.00
Limited Scope: Fort Walton Beach/Destin	0	0.00	92.47	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2001 Peer Small Business Data: US&PR.

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased by the bank.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2002).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 9.84% of small loans to farms originated and purchased by the bank.

Table 13 – Consumer Loans omitted as not applicable. The bank did not opt to have consumer lending included in the evaluation.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: WHITNEY 99-2002									
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>State of Louisiana</b>									
Full Scope: New Orleans AA	*	*	210	5,769	210	5,769	33.5	0	0
Limited Scope:									
Baton Rouge AA	*	*	49	1,909	49	1,909	11.1	0	0
Lafayette AA	*	*	42	468	42	468	2.7	0	0
Lake Charles AA	*	*	22	205	22	205	1.2	0	0
Houma AA	*	*	18	1,087	18	1,087	6.3	0	0
Morgan City AA	*	*	13	210	13	210	1.2	0	0
<b>State of Texas</b>									
Full Scope: Houston AA	*	*	30	3,525	30	3,525	20.5	0	0
<b>State of Mississippi</b>									
Full Scope: Gulfport AA	*	*	29	1,395	29	1,395	8.1	0	0
<b>State of Alabama</b>									
Full Scope: Mobile AA	*	*	18	513	18	513	3.0	0	0
Limited Scope:									
Montgomery AA	*	*	11	1,849	11	1,849	10.8	0	0
Greenville AA	*	*	6	100	6	100	0.6	0	0
<b>State of Florida</b>									
Full Scope: Pensacola AA	*	*	21	177	21	177	1.0	0	0
Limited Scope: Fort Walton Beach/Destin	N/A	N/A	1	.35	1	.35	0.0	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date. The \$1MM invested in the CDC is allocated in the 1996-98 table of Qualified Investments.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Witney 99-2002																	
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>State of Louisiana</b>																	
Full Scope: New Orleans AA	51.2	39	31.2	7.69	20.51	25.64	46.15	0	0	0	0	0	0	11.73	21.20	35.64	31.55
Limited Scope:																	
Baton Rouge AA	8.2	15	12.0	0.00	13.33	33.33	53.33	1	4	0	0	-1	-2	11.78	16.95	41.06	30.21
Lafayette AA	4.0	6	4.8	0.00	16.67	33.33	50.00	0	0	0	0	0	0	6.38	8.56	27.23	57.83
Lake Charles AA	3.5	7	5.6	0.00	0.00	42.86	57.14	0	0	0	0	0	0	6.60	16.04	50.94	26.38
Houma AA	5.9	9	7.2	0.00	11.11	66.67	22.22	0	0	0	0	0	0	0.00	10.44	74.47	14.75
Morgan City AA	4.0	7	5.6	0.00	14.29	28.57	57.14	0	1	0	0	-1	0	0.00	11.82	51.13	37.05
<b>State of Texas</b>																	
Full Scope: Houston AA	8.0	9	7.2	22.22	33.33	33.33	11.11	1	0	0	0	+1	0	9.07	28.71	32.36	29.86
<b>State of Mississippi</b>																	
Full Scope: Gulfport AA	3.7	8	6.4	12.50	12.50	50.00	25.00	0	2	0	-1	-1	0	2.03	12.99	73.53	11.44
<b>State of Alabama</b>																	
Full Scope: Mobile AA	3.9	11	8.0	0.00	0.00	70.00	30.00	1	1	0	0	+1	-1	10.66	11.53	52.75	24.59
Limited Scope:																	
Montgomery AA	2.8	5	4.0	0.00	40.00	0.00	60.00	1	0	0	0	0	+1	10.25	18.12	43.72	27.90
Greenville AA	1.7	3	2.4	0.00	66.67	0.00	33.33	0	0	0	0	0	0	0.00	56.42	36.61	6.98
<b>State of Florida</b>																	
Full Scope: Pensacola AA	3.1	6	4.0	0.00	0.00	100.0	0.00	1	1	0	-1	+1	0	4.08	12.26	62.68	20.74
Limited Scope: Fort Walton Beach/Destin	0.1	2	1.6	0.00	0.00	100.0	0.00	2	0	0	0	+2	0	0.00	17.71	61.56	20.73



## Tables of Performance Data 1996-1998

**Table 1. Lending Volume**

LENDING VOLUME												Geography: WHITNEY 96-1998		Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 1998	
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
<b>State of Louisiana</b>															
Full Scope: New Orleans AA	57.72	4,455	309,074	7,423	770,930	15	2,049	98	48,387	11,991	1,130,440	51.21			
Limited Scope: Baton Rouge AA	9.01	968	70,349	882	76,649	6	1,363	15	1,202	1,871	149,563	8.23			
Lafayette AA	6.55	414	19,720	940	69,565	3	357	3	265	1,360	89,907	4.04			
Lake Charles AA	1.45	127	3,699	167	10,839	2	36	5	7,424	301	21,998	3.51			
Houma AA	4.64	667	38,409	279	38,822	14	1,020	4	224	964	78,475	5.86			
Morgan City AA	5.59	434	13,346	714	54,129	8	972	5	8,380	1,161	76,827	4.00			
<b>State of Texas</b>															
Full Scope: Houston AA	0.09	0	0	19	3,169	0	0	0	0	19	3,169	8.02			
<b>State of Mississippi</b>															
Full Scope: Gulfport AA	2.53	376	26,203	145	7,634	5	693	0	0	526	34,530	3.68			
<b>State of Alabama</b>															
Full Scope: Mobile AA	8.16	476	45,635	1,214	139,227	2	164	3	4,493	1,695	189,519	3.87			
Limited Scope: Montgomery AA	0.98	24	3,269	173	22,229	2	355	5	191	204	26,044	2.78			
Greenville AA	0.04	6	38	1	65	0	0	1	12	8	115	1.69			
<b>State of Florida</b>															
Full Scope: Pensacola	3.18	216	24,111	433	58,099	3	305	9	1,544	661	84,059	3.08			
Limited Scope: Fort Walton Beach/Destin	0.07	6	1,319	9	3,067	0	0	0	0	15	4,386	.05			

\* Loan Data as of December 31, 1998.

\*\* The evaluation period for Community Development Loans is From January 01, 1996 to December 31, 1998.

\*\*\* Deposit Data as of June 30, 2001.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE															Geography: WHITNEY 96-1998					Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 1998				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>†</sup>													
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>State of Louisiana</b>																								
Full Scope: New Orleans AA	1,092	47.69	4.71	4.76	17.11	10.26	40.30	35.44	37.88	49.54	2.65	1.76	1.98	2.53	3.04									
Limited Scope: Baton Rouge AA	359	15.98	7.06	1.39	15.90	6.69	42.09	42.62	34.95	49.30	1.63	3.45	1.19	1.38	1.92									
Lafayette AA	111	4.85	5.07	2.70	7.57	11.71	26.54	17.12	60.82	68.47	1.25	3.13	2.86	0.63	1.33									
Lake Charles AAS	10	0.44	4.81	0.00	14.20	10.00	52.16	50.00	28.84	40.00	1.43	0.00	1.06	1.02	2.00									
Houma AA	244	10.66	0.00	0.00	9.10	4.51	75.92	63.93	14.97	31.56	3.17	0.00	3.82	2.97	3.50									
Morgan City AA	116	5.07	0.00	0.00	9.14	2.59	51.60	46.55	39.26	50.86	2.48	0.00	1.85	2.29	2.71									
<b>State of Texas</b>																								
Full Scope: Houston AA	0	0.00	5.76	0.00	22.64	0.00	32.26	0.00	39.34	0.00	0.07	0.19	0.09	0.06	0.08									
<b>State of Mississippi</b>																								
Full Scope: Gulfport AA	109	4.76	1.28	0.00	11.40	3.67	73.01	57.80	14.31	38.53	1.07	0.00	1.73	1.08	0.83									
<b>State of Alabama</b>																								
Full Scope: Mobile AA	143	6.24	6.22	9.79	9.56	1.40	57.42	45.45	26.80	43.36	0.99	3.15	3.37	0.85	0.91									
Limited Scope: Montgomery AA	11	0.48	4.94	0.00	17.56	0.00	44.13	27.27	33.37	72.73	0.41	0.00	1.07	0.61	0.17									
Greenville AA	1	0.04	0.00	0.00	51.50	0.00	39.50	100.00	9.00	0.00	1.69	0.00	2.25	0.00	2.38									
<b>State of Florida</b>																								
Full Scope: Pensacola AA	89	3.89	3.05	2.25	10.54	4.49	63.69	51.69	22.72	41.57	0.76	2.78	0.38	0.63	1.12									
Limited Scope: Fort Walton Beach/Destin AA	5	0.22	0.00	0.00	7.71	0.00	68.72	80.00	23.57	20.00	0.61	0.00	2.42	0.59	0.27									

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased by the bank.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: WHITNEY 96-1998				Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 1998					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>State of Louisiana</b>																
Full Scope: New Orleans AA	2,225	63.34	4.71	4.58	17.11	10.88	40.30	32.90	37.88	51.64	18.21	18.72	16.67	16.42	20.73	
Limited Scope: Baton Rouge AA	286	8.14	7.06	4.90	15.90	8.39	42.09	34.62	34.95	52.10	7.18	10.34	7.30	6.46	7.63	
Lafayette AA	236	6.72	5.07	1.27	7.57	4.24	26.54	15.25	60.82	79.24	9.09	10.00	4.55	6.28	10.57	
Lake Charles AA	68	1.94	4.81	0.00	14.20	1.47	52.16	58.82	28.84	39.71	10.65	9.09	12.75	10.53	10.28	
Houma AA	182	5.18	0.00	0.00	9.10	9.34	75.92	62.64	14.97	27.47	13.29	0.00	14.71	12.56	15.56	
Morgan City AA	238	6.77	0.00	0.00	9.14	3.36	51.60	54.62	39.26	42.02	12.68	0.00	16.67	16.18	8.86	
<b>State of Texas</b>																
Full Scope: Houston AA	0	0.00	5.76	0.00	22.64	0.00	32.26	0.00	39.34	0.00	0.79	4.38	1.21	0.50	0.44	
<b>State of Mississippi</b>																
Full Scope: Gulfport AA	139	3.96	1.28	0.00	11.40	12.95	73.01	76.26	14.31	10.79	5.43	6.25	7.52	4.62	8.66	
<b>State of Alabama</b>																
Full Scope: Mobile AA	110	3.13	6.22	0.00	9.56	3.64	57.42	56.36	26.80	40.00	4.53	5.00	0.00	3.82	7.12	
Limited Scope: Montgomery AA	0	0.00	4.94	0.00	17.56	0.00	44.13	0.00	33.37	0.00	3.31	0.00	6.32	3.80	1.64	
Greenville AA	5	0.14	0.00	0.00	51.50	60.00	39.50	20.00	9.00	20.00	18.10	0.00	14.29	26.09	25.00	
<b>State of Florida</b>																
Full Scope: Pensacola AA	24	0.68	3.05	4.17	10.54	12.50	63.69	50.00	22.72	33.33	2.54	12.50	2.33	2.12	3.23	
Limited Scope: Fort Walton Beach/Destin	0	0.00	0.00	0.00	7.71	0.00	68.72	0.00	23.57	0.00	0.73	0.00	7.14	0.00	1.33	

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased by the bank.

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: WHITNEY 96-1998				Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 1998					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>State of Louisiana</b>																
Full Scope: New Orleans AA	1,131	48.01	4.71	1.41	17.11	7.07	40.30	32.01	37.88	59.50	3.76	2.13	2.27	3.10	4.79	
Limited Scope: Baton Rouge AA	322	13.67	7.06	2.48	15.90	4.04	42.09	37.89	34.95	55.59	2.07	1.35	0.62	2.08	2.43	
Lafayette AA	67	2.84	5.07	0.00	7.57	0.00	26.54	23.88	60.82	76.12	2.04	0.00	1.15	1.18	2.35	
Lake Charles AA	49	2.08	4.81	0.00	14.20	6.12	52.16	61.22	28.84	32.65	1.40	0.00	0.99	1.32	1.68	
Houma AA	240	10.19	0.00	0.00	9.10	6.67	75.92	58.33	14.97	35.00	3.43	0.00	2.73	3.34	3.81	
Morgan City AA	79	3.35	0.00	0.00	9.14	1.27	51.60	53.16	39.26	45.57	2.84	0.00	1.94	3.47	2.41	
<b>State of Texas</b>																
Full Scope: Houston AA	0	0.00	5.76	0.00	22.64	0.00	32.26	0.00	39.34	0.00	0.04	0.11	0.11	0.05	0.02	
<b>State of Mississippi</b>																
Full Scope: Gulfport AA	128	5.43	1.28	0.00	11.40	8.59	73.01	57.81	14.31	33.59	1.97	0.00	2.48	1.86	2.28	
<b>State of Alabama</b>																
Full Scope: Mobile AA	223	9.47	6.22	0.45	9.56	1.79	57.42	47.09	26.80	50.67	0.78	0.61	0.00	0.71	1.03	
Limited Scope: Montgomery AA	13	0.55	4.94	0.00	17.56	15.38	44.13	23.08	33.37	61.54	1.52	0.00	1.77	2.00	1.19	
Greenville AA	0	0.00	0.00	0.00	51.50	0.00	39.50	0.00	9.00	0.00	5.98	0.00	7.78	2.17	6.25	
<b>State of Florida</b>																
Full Scope: Pensacola AA	103	4.37	3.05	2.91	10.54	6.80	63.69	54.37	22.72	34.95	1.23	2.50	0.93	1.23	1.24	
Limited Scope: Fort Walton Beach/Destin	1	0.04	0.00	0.00	7.71	0.00	68.72	100.00	23.57	0.00	0.17	0.00	0.61	0.17	0.10	

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased by the bank.

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY															
Geography: WHITNEY 96-1998															
Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 1998															
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>State of Louisiana</b>															
Full Scope: New Orleans AA	7	70.00	20.40	0.00	21.95	14.29	29.68	57.14	27.98	28.57	7.91	10.53	9.76	9.30	2.78
Limited Scope: Baton Rouge AA	1	10.00	19.39	100.00	17.46	0.00	37.57	0.00	25.58	0.00	0.00	0.00	0.00	0.00	0.00
Lafayette AA	0	0.00	1.34	0.00	5.62	0.00	21.60	0.00	71.44	0.00	7.14	0.00	0.00	0.00	12.50
Lake Charles AA	0	0.00	3.99	0.00	31.33	0.00	40.98	0.00	23.71	0.00	0.00	0.00	0.00	0.00	0.00
Houma AA	1	10.00	0.00	0.00	4.82	0.00	70.09	100.00	25.09	0.00	0.00	0.00	0.00	0.00	0.00
Morgan City AA	1	10.00	0.00	0.00	14.06	0.00	53.71	0.00	32.23	100.00	0.00	0.00	0.00	0.00	0.00
<b>State of Texas</b>															
Full Scope: Houston AA	0	0.00	10.14	0.00	34.65	0.00	32.55	0.00	22.66	0.00	0.00	0.00	0.00	0.00	0.00
<b>State of Mississippi</b>															
Full Scope: Gulfport AA	0	0.00	3.42	0.00	8.05	0.00	74.97	0.00	13.55	0.00	5.00	0.00	33.33	0.00	0.00
<b>State of Alabama</b>															
Full Scope: Mobile AA	0	0.00	7.44	0.00	11.73	0.00	51.72	0.00	29.11	0.00	0.00	0.00	0.00	0.00	0.00
Limited Scope: Montgomery AA	0	0.00	20.62	0.00	7.20	0.00	39.05	0.00	33.14	0.00	0.00	0.00	0.00	0.00	0.00
Greenville AA	0	0.00	0.00	0.00	87.61	0.00	6.84	0.00	5.56	0.00	0.00	0.00	0.00	0.00	0.00
<b>State of Florida</b>															
Full Scope: Pensacola AA	0	0.00	5.99	0.00	6.97	0.00	43.43	0.00	43.61	0.00	0.00	0.00	0.00	0.00	0.00
Limited Scope: Fort Walton Beach/Destin	0	0.00	0.00	0.00	13.50	0.00	76.74	0.00	9.76	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased by the bank.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: WHITNEY 96-1998					Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 1998					Market Share (%) by Geography*				
Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies								
#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp		
<b>State of Louisiana</b>																
Full Scope: New Orleans AA	7,423	59.87	8.36	8.57	20.60	19.55	33.34	27.83	37.69	44.05	12.93	15.93	15.08	11.85	13.92	
Limited Scope: Baton Rouge AA	882	7.11	8.43	7.82	12.48	10.66	41.76	34.69	37.34	46.83	4.70	3.59	4.39	4.99	5.43	
Lafayette AA	940	4.88	3.00	4.04	5.49	5.21	30.53	24.79	60.98	65.96	5.62	10.17	10.11	6.39	6.00	
Lake Charles AA	167	1.35	4.64	1.80	21.70	17.96	48.79	40.72	24.87	39.52	7.60	3.51	8.86	6.37	10.95	
Houma AA	279	2.25	0.00	0.00	9.96	12.90	71.72	63.80	17.80	23.30	7.05	0.00	8.96	7.61	7.76	
Morgan City MA	714	5.76	0.00	0.00	10.70	0.84	50.60	48.88	38.69	50.28	9.82	0.00	0.00	14.61	8.79	
<b>State of Texas</b>																
Full Scope: Houston AA	19	0.15	5.94	11.76	25.11	5.88	29.88	29.41	38.80	52.94	0.81	0.83	0.71	0.77	1.03	
<b>State of Mississippi</b>																
Full Scope: Gulfport AA	145	1.17	7.71	13.10	15.97	11.72	65.21	62.76	11.10	12.41	1.68	1.50	2.77	1.36	2.78	
<b>State of Alabama</b>																
Full Scope: Mobile AA	1,214	9.79	5.75	8.95	8.23	9.54	57.23	46.50	26.42	35.02	3.67	9.86	4.59	2.93	4.61	
Limited Scope: Montgomery AA	173	1.40	16.28	11.56	14.77	4.05	31.71	19.08	37.24	65.32	2.86	1.98	1.79	3.53	3.39	
Greenville AA	1	0.01	0.00	0.00	40.57	0.00	19.09	0.00	40.33	100.00	1.39	0.00	2.07	1.71	0.00	
<b>State of Florida</b>																
Full Scope: Pensacola AA	433	3.49	7.22	16.63	11.76	25.56	58.79	34.99	19.76	22.83	2.27	4.40	2.77	1.84	1.99	
Limited Scope: Fort Walton Beach/Destin	9	0.07	0.00	0.00	11.63	22.22	73.62	66.67	14.75	11.11	0.23	0.00	0.16	0.29	0.00	

\* Based on 2001 Peer Small Business Data: US&PR.

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased by the bank.

\*\*\* Source Data - Dun and Bradstreet (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: WHITNEY 96-1998															
Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 1998															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>State of Louisiana</b>															
Full Scope: New Orleans AA	15	25.00	2.59	0.00	17.77	40.00	44.69	20.00	34.94	40.00	4.12	0.00	3.70	3.70	8.00
Limited Scope: Baton Rouge AA	6	10.00	4.10	50.00	8.73	16.67	41.18	33.33	45.99	0.00	8.82	0.00	0.00	18.75	0.00
Lafayette AA	3	5.00	1.38	0.00	1.38	0.00	37.02	33.33	60.21	66.67	3.70	0.00	0.00	0.00	4.35
Lake Charles AA	2	3.33	0.44	100.00	16.74	0.00	58.15	0.00	24.67	0.00	0.00	0.00	0.00	0.00	0.00
Houma AA	14	23.33	0.00	0.00	11.85	35.71	70.74	57.14	17.04	7.14	28.57	0.00	50.00	12.50	33.33
Morgan City AA	8	13.33	0.00	0.00	3.93	0.00	56.74	50.00	39.33	50.00	5.05	0.00	0.00	4.48	6.67
<b>State of Texas</b>															
Full Scope: Houston AA	0	0.00	3.84	0.00	19.38	0.00	35.45	0.00	41.30	0.00	3.13	0.00	6.67	0.00	5.08
<b>State of Mississippi</b>															
Full Scope: Gulfport AA	5	8.33	2.26	0.00	9.50	0.00	80.54	100.00	7.69	0.00	38.71	60.00	75.00	21.05	66.67
<b>State of Alabama</b>															
Full Scope: Mobile AA	2	3.33	2.97	0.00	3.68	50.00	73.37	50.00	19.41	0.00	10.62	0.00	100.00	0.00	8.33
Limited Scope: Montgomery AA	2	3.33	3.86	0.00	20.00	0.00	39.30	50.00	36.84	50.00	6.74	0.00	6.76	8.86	0.00
Greenville AA	0	0.00	0.00	0.00	41.46	0.00	43.90	0.00	14.63	0.00	1.75	0.00	0.00	2.78	0.00
<b>State of Florida</b>															
Full Scope: Pensacola AA	3	5.00	2.10	0.00	7.48	33.33	72.18	66.67	17.98	0.00	0.00	0.00	0.00	0.00	0.00
Limited Scope: Fort Walton Beach/Destin	0	0.00	0.00	0.00	7.53	0.00	80.33	0.00	12.13	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2001 Peer Small Business Data: US&amp;PR.

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased by the bank.

\*\*\* Source Data - Dun and Bradstreet (2002).

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

Borrower Distribution: HOME PURCHASE																
Geography: WHITNEY 96-1998																
Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 1998																
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>†</sup>					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
<b>State of Louisiana</b>																
Full Scope: New Orleans AA	1,092	47.69	24.88	11.25	15.58	21.40	18.74	18.63	40.80	48.71	3.47	3.44	3.85	3.37	3.38	
Limited Scope: Baton Rouge AA	359	15.68	23.59	13.13	15.54	28.77	20.02	22.07	40.84	36.03	1.98	3.12	1.78	1.32	2.24	
Lafayette AA	111	4.85	19.35	11.82	12.66	20.91	16.04	22.73	51.95	44.55	1.45	1.89	1.80	1.09	1.49	
Lake Charles AA	10	0.44	23.79	0.00	16.25	0.00	19.26	66.67	40.69	33.33	1.37	1.70	2.12	1.89	0.69	
Houma AA	244	10.66	24.14	5.35	15.31	14.40	19.66	25.93	40.89	54.32	3.66	1.11	2.22	4.07	4.14	
Morgan City AA	116	5.07	21.11	4.31	14.72	13.79	16.50	23.28	47.67	58.62	3.04	0.00	1.79	2.91	3.38	
<b>State of Texas</b>																
Full Scope: Houston AA	0	0.00	23.16	0.00	16.84	0.00	20.14	0.00	39.87	0.00	0.08	0.07	0.05	0.04	0.12	
<b>State of Mississippi</b>																
Full Scope: Gulfport AA	109	4.76	22.82	1.85	17.54	11.11	21.31	16.67	38.33	70.37	1.33	0.44	1.23	1.07	1.69	
<b>State of Alabama</b>																
Full Scope: Mobile AA	143	6.24	22.99	7.41	16.63	11.11	19.98	11.85	40.40	69.63	1.06	3.41	1.45	0.57	0.72	
Limited Scope: Montgomery AA	11	0.48	22.63	0.00	16.03	9.09	20.63	18.18	40.71	72.73	0.46	0.47	0.17	0.91	0.35	
Greenville AA	1	0.04	30.34	0.00	14.91	0.00	21.85	100.00	32.90	0.00	2.05	4.35	0.00	0.00	4.00	
<b>State of Florida</b>																
Full Scope: Pensacola AA	89	3.89	20.52	6.98	18.10	15.12	21.88	19.77	39.49	58.14	0.87	1.14	1.09	0.69	0.82	
Limited Scope: Fort Walton Beach/Destin	5	0.22	14.93	0.00	20.10	0.00	23.18	0.00	41.79	100.00	0.71	2.21	1.69	0.61	0.26	

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* As a percentage of loans with borrower income information available. No information was available for 2.43% of loans originated and purchased by the bank.

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

\*\*\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased by the bank.



**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: WHITNEY 96-1998					Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 1998					Market Share <sup>†</sup>				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>State of Louisiana</b>																
Full Scope: New Orleans AA	2,225	63.34	24.88	7.27	15.58	13.59	18.74	19.51	40.80	59.63	17.53	15.50	15.24	16.11	19.32	
Limited Scope: Baton Rouge AA	286	8.14	23.59	4.66	15.54	16.10	20.02	22.03	40.84	57.20	6.98	7.33	5.94	5.74	8.11	
Lafayette AA	236	6.72	19.35	6.82	12.66	10.00	16.04	17.27	51.95	65.91	8.88	7.25	7.00	8.62	9.54	
Lake Charles AA	68	1.94	23.79	6.67	16.25	6.67	19.26	53.33	40.69	33.33	10.53	7.69	11.92	9.85	11.00	
Houma AA	182	5.18	24.14	10.69	15.31	11.32	19.66	25.79	40.89	52.20	12.40	11.49	11.84	11.74	12.91	
Morgan City AA	238	6.77	21.11	4.00	14.72	12.00	16.50	23.50	47.67	60.50	11.28	12.00	8.05	11.11	11.88	
<b>State of Texas</b>																
Full Scope: Houston AA	0	0.00	23.16	0.00	16.84	0.00	20.14	0.00	39.87	0.00	0.63	1.23	0.34	0.48	0.65	
<b>State of Mississippi</b>																
Full Scope: Gulfport	139	3.96	22.82	10.66	17.54	18.03	21.31	23.77	38.33	47.54	4.58	4.17	2.50	5.20	5.64	
<b>State of Alabama</b>																
Full Scope: Mobile AA	110	3.13	22.99	7.84	16.63	14.71	19.98	21.57	40.40	55.88	4.31	1.29	3.17	6.73	4.23	
Limited Scope: Montgomery AA	0	0.00	22.63	0.00	16.03	0.00	20.63	0.00	40.71	0.00	3.44	3.08	6.02	3.23	2.56	
Greenville AA	5	0.14	30.34	50.00	14.91	25.00	21.85	0.00	32.90	25.00	17.70	17.24	15.15	11.11	29.17	
<b>State of Florida</b>																
Full Scope: Pensacola AA	24	0.68	20.52	8.70	18.10	26.09	21.88	21.74	39.49	43.48	2.73	3.85	1.99	2.27	2.96	
Limited Scope: Fort Walton Beach/Destin	0	0.00	14.93	0.00	20.10	0.00	23.18	0.00	41.79	0.00	0.41	0.00	0.00	0.00	0.84	

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* As a percentage of loans with borrower income information available. No information was available for 11.82% of loans originated and purchased by the bank.

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

\*\*\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased by the bank.

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

Borrower Distribution: HOME MORTGAGE REFINANCE																
Geography: WHITNEY 96-1998																
Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 1998																
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>7</sup>					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
<b>State of Louisiana</b>																
Full Scope: New Orleans AA	1,131	48.01	24.88	2.34	15.58	9.70	18.74	18.33	40.80	69.63	4.67	2.03	4.16	4.43	5.14	
Limited Scope: Baton Rouge AA	322	13.67	23.59	3.15	15.54	10.41	20.02	21.14	40.84	65.30	2.41	1.00	1.50	2.52	2.82	
Lafayette AA	67	2.84	19.35	0.00	12.66	12.12	16.04	10.61	51.95	77.27	2.52	0.00	1.14	3.00	2.70	
Lake Charles AA	49	2.08	23.79	0.00	16.25	7.69	19.26	7.69	40.69	84.62	1.55	0.58	0.93	1.53	1.80	
Houma AA	240	10.19	24.14	2.09	15.31	5.02	19.66	15.48	40.89	77.41	3.78	1.61	2.99	3.56	4.15	
Morgan City AA	79	3.35	21.11	1.32	14.72	9.21	16.50	11.84	47.67	77.63	3.69	2.56	3.27	2.06	4.10	
<b>State of Texas</b>																
Full Scope: Houston AA	0	0.00	23.16	0.00	16.84	0.00	20.14	0.00	39.87	0.00	0.05	0.09	0.02	0.03	0.07	
<b>State of Mississippi</b>																
Full Scope: Gulfport AA	128	5.43	22.82	1.63	17.54	6.50	21.31	20.33	38.33	71.54	2.27	2.69	1.47	2.11	2.55	
<b>State of Alabama</b>																
Full Scope: Mobile AA	223	9.47	22.99	1.36	16.63	9.50	19.98	16.29	40.40	72.85	0.90	0.46	0.53	0.89	1.08	
Limited Scope: Montgomery AA	13	0.55	22.63	0.00	16.03	7.69	20.63	15.38	40.71	76.92	1.91	1.05	2.20	1.95	1.94	
Greenville AA	0	0.00	30.34	0.00	14.91	0.00	21.85	0.00	32.90	0.00	7.91	21.43	0.00	5.56	9.52	
<b>State of Florida</b>																
Full Scope: Pensacola AA	103	4.37	20.52	0.00	18.10	5.83	21.88	16.50	39.49	77.67	1.42	1.25	0.94	1.01	1.80	
Limited Scope: Fort Walton Beach/Destin	1	0.04	14.93	0.00	20.10	0.00	23.18	0.00	41.79	100.00	0.20	0.00	0.00	0.64	0.11	

\* Based on 2001 Peer Mortgage Data: Southwest and Southeast Regions.

\*\* As a percentage of loans with borrower income information available. No information was available for 3.88% of loans originated and purchased by the bank.

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

\*\*\*\* Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased by the bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: WHITNEY 96-98					Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 1998				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>State of Louisiana</b>									
Full Scope: New Orleans AA	7,423	59.87	69.58	70.54	76.34	13.00	10.66	12.93	14.67
Limited Scope: Baton Rouge AA	882	7.11	67.49	72.11	79.93	11.79	8.28	4.70	5.58
Lafayette AA	940	7.58	69.36	78.72	83.94	9.79	6.28	5.62	5.33
Lake Charles AA	167	1.35	70.69	88.02	86.83	7.19	5.99	7.60	11.58
Houma AA	279	2.25	70.93	65.95	72.40	10.75	16.85	7.05	6.76
Morgan City AA	714	5.76	69.59	69.19	80.95	11.90	7.14	9.82	9.27
<b>State of Texas</b>									
Full Scope: Houston AA	19	0.15	66.68	78.95	63.16	10.53	26.32	0.81	1.09
<b>State of Mississippi</b>									
Full Scope: Gulfport AA	145	1.17	74.45	58.62	89.66	6.21	4.14	1.68	2.13
<b>State of Alabama</b>									
Full Scope: Mobile AA	1,214	9.79	79.68	48.19	70.35	17.71	11.94	3.67	3.68
Limited Scope: Montgomery AA	173	1.40	80.45	56.65	71.68	12.14	16.18	2.86	4.35
Greenville AA	1	0.01	84.37	0.00	100.00	0.00	0.00	1.39	1.52
<b>State of Florida</b>									
Full Scope: Pensacola AA	433	3.49	70.20	41.11	64.67	20.09	15.24	2.27	2.77
Limited Scope: Fort Walton Beach/Destin	9	0.07	67.57	33.33	11.11	22.22	66.67	0.23	0.36

\* Based on 2001 Peer Small Business Data: US&PR.

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased by the bank.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 6.53% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: WHITNEY 96-1998			Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 1998				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>State of Louisiana</b>									
Full Scope: New Orleans AA	15	25.00	91.72	86.67	60.00	13.33	26.67	4.12	3.39
Limited Scope: Baton Rouge AA	6	10.00	91.98	50.00	16.67	33.33	50.00	8.82	7.41
Lafayette AA	3	5.00	91.35	100.00	66.67	0.00	33.33	3.70	5.56
Lake Charles AA	2	3.33	94.27	100.00	100.00	0.00	0.00	0.00	0.00
Houma AA	14	23.33	92.96	100.00	78.57	21.43	0.00	28.57	27.78
Morgan City AA	8	13.33	82.58	87.50	75.00	0.00	25.00	5.05	4.65
<b>State of Texas</b>									
Full Scope: Houston AA	0	0.00	91.01	0.00	0.00	0.00	0.00	3.13	1.19
<b>State of Mississippi</b>									
Full Scope: Gulfport AA	5	8.33	96.83	100.00	40.00	40.00	20.00	38.71	42.31
<b>State of Alabama</b>									
Full Scope: Mobile AA	2	3.33	90.08	50.00	50.00	50.00	0.00	10.62	10.31
Limited Scope: Montgomery AA	2	3.33	90.53	50.00	50.00	0.00	50.00	6.74	3.01
Greenville AA	0	0.00	95.12	0.00	0.00	0.00	0.00	1.75	0.00
<b>State of Florida</b>									
Full Scope: Pensacola AA	3	5.00	95.28	33.33	33.33	66.67	0.00	0.00	0.00
Limited Scope: Fort Walton Beach/Destin	0	0.00	92.47	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2001 Peer Small Business Data: US&PR.

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased by the bank.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2002).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 9.84% of small loans to farms originated and purchased by the bank.

Table 13 – Consumer Loans omitted as not applicable. The bank did not opt to have consumer loans included in this evaluation.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: WHITNEY 96-1998									
Evaluation Period: JANUARY 1, 1996 TO DECEMBER 31, 1999									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>State of Louisiana</b>									
Full Scope: New Orleans AA	1	512	117	2,653	118	3,165	70.0	0	0
Limited Scope:									
Baton Rouge AA	1	82	33	83	34	190	4.2	0	0
Lafayette AA	1	40	22	101	23	141	3.1	0	0
Lake Charles AA	1	35	4	12	5	47	1.0	0	0
Houma AA	1	59	10	3	11	62	1.4	0	0
Morgan City AA	1	40	8	7	9	47	1.0	0	0
<b>State of Texas</b>									
Full Scope: Houston AA	1	80	7	532	8	612	13.6	0	0
<b>State of Mississippi</b>									
Full Scope: Gulfport AA	1	37	13	4	14	41	0.9	0	0
<b>State of Alabama</b>									
Full Scope: Mobile AA	1	39	24	58	25	97	2.2	0	0
Limited Scope:									
Montgomery AA	1	28	2	2	3	30	0.7	0	0
Greenville AA	1	17	1	25	2	42	0.9	0	0
<b>State of Florida</b>									
Full Scope: Pensacola AA	1	31	8	3	9	34	0.8	0	0
Limited Scope: Fort Walton Beach/Destin	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date. This represents the \$1MM invested in the CDC in 1995 allocated by deposit share by AA.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings, for the period 1996-1998 would not be meaningful.**

**Table 15 is included for the entire evaluation period, 1996-2002, and for 1999-2002, to demonstrate the effects of acquisitions and expansion of operations into other states over the evaluation period. Branches opened or closed from 1996-1998 is the difference in branch openings and closings listed in Table 15 for the entire evaluation period and the period 1999-2002.**

