

CRA RATINGS OF MASSACHUSETTS BANKS, CREDIT UNIONS, AND LICENSED MORTGAGE LENDERS IN 2012

MAHA's Twenty-Second Annual Report on How Well
Lenders and Regulators Are Meeting Their Obligations
Under the Community Reinvestment Act

Prepared for the

Massachusetts Affordable Housing Alliance

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February 2013

INTRODUCTION AND SUMMARY OF MAJOR FINDINGS

Since 1990, state and federal bank regulators have been required to make public their ratings of the performance of individual banks in serving the credit needs of local communities, in accordance with the provisions of the federal Community Reinvestment Act (CRA) and its Massachusetts counterpart. And since 1991, the Massachusetts Affordable Housing Alliance (MAHA) has issued annual reports offering a comprehensive listing and analysis of all CRA ratings of Massachusetts banks and credit unions. This is the twenty-second report in this annual series. Beginning two years ago, these reports also include information on the CRA-like ratings of licensed mortgage lenders issued by the state's Division of Banks since 2009 in accordance with its "Mortgage Lender Community Investment" (MLCI) regulation.¹

As defined in this report, there were 159 "Massachusetts banks" as of December 31, 2012. This includes not only 150 banks that have headquarters in the state, but also nine large banks based elsewhere that have a substantial presence in the state. **Table A-1 provides a listing of the 159 Massachusetts banks and their current CRA ratings.** (The 31 federally-chartered banks and one California-chartered bank receive ratings only from their federal regulator; all other Massachusetts banks are chartered by the state and receive ratings from both Massachusetts and federal regulators.) Banks that operate in more than one state receive separate federal CRA ratings for each state as well as an overall CRA rating; for such banks, this report uses the CRA rating for their Massachusetts operations rather than the overall rating.² **Table A-2 provides information on the 36 banks that have branches both inside and outside of Massachusetts,** including fourteen out-of-state banks that have a relatively small presence in the state and are not classified here as "Massachusetts banks." **Table A-3 provides a listing of the current CRA ratings of the state's 84 state-chartered credit unions.** (The 119 federally-chartered credit unions based in Massachusetts are not covered by CRA.) **Table A-4 provides a listing of all current CRA (MLCI) ratings of licensed mortgage lenders.**

Tables 1-7 present information about the distribution of the most recent CRA ratings of banks, credit unions, and licensed mortgage lenders as of year-end 2012; about the distribution of CRA ratings awarded during the calendar year 2012 and during earlier years; and on the number and distribution of CRA ratings awarded annually by each of the federal bank regulators and by the state's Division of Banks. Some of the notable findings contained in those tables may be summarized as follows:

- **Of the 100 CRA ratings awarded to Massachusetts banks by all regulators combined during 2012, exactly one-fifth (20.0%) were "Outstanding."** This is down slightly from 21.7% in 2011, but higher than in the three preceding years (when the share of "Outstanding" ratings ranged from 12.0% to 17.1%). The percentage of "Outstanding" ratings remains dramatically lower than during the 2005-2007 period, when over one-third of all CRA ratings were "Outstanding." (See Table 1.)
- **The 100 CRA ratings awarded to Massachusetts banks in 2012 were not only many more than the 66 ratings in 2011, but were also the greatest number of ratings in any year in the current millennium.** (See Table 1).

¹ The MLCI regulation was adopted pursuant to the 2007 passage of "An Act Protecting and Preserving Homeownership," legislation that was a major MAHA legislative priority and was supported by a broad coalition of community organizations.

² To be more precise, banks with branches in more than one state receive not only an overall CRA rating, but also (1) a separate rating for each multistate metropolitan statistical area (MSA) within which they have branches and (2) a separate rating for each state (the "state" rating excludes any part of the state covered by a multistate MSA rating). Since most of the Massachusetts activity of Bank of America and Sovereign is within multistate MSAs (e.g., the Boston MA-NH MSA), their "Massachusetts" CRA ratings are based on evaluation of only a small portion of their activity within the state. Therefore, their ratings in this report are those for these multistate MSAs.

- When each bank is classified by its most recent CRA rating, **one-fifth (19.5%) of all banks had a most recent rating of “Outstanding” at year-end 2012, the same percentage as a year earlier. This is almost twelve percentage points lower than the all-time high of 31.3% reached in 2007.** Another 13.2% of banks had a most recent rating of “High Satisfactory,” and exactly two-thirds (67.7%) of all banks had a most recent rating of “Satisfactory.” OneUnited Bank, with its rating of “Needs to Improve,” was the only bank with a most recent rating lower than “Satisfactory.” (See Table 2.)
- **The state’s ten biggest banks were all rated “Outstanding” in their most recent CRA exams.** These ten banks, ranked by total deposits as reported by the FDIC for mid-2012, are: Bank of America, State Street, RBS Citizens, Sovereign, TD Bank, Eastern, Rockland Trust, Middlesex Savings, BNY Mellon, and People’s United.³ (See Table A-1 for ratings of all individual banks.)
- When banks are classified, for each regulator, in terms of the year in which they most recently received a CRA rating, the data reveal that **59.1% of Massachusetts banks have received at least one CRA rating (federal and/or state) within the past two years and that only one bank has not received any CRA rating within the last five years.** (RBS Citizens has not received a CRA rating for its performance in Massachusetts since 2004.⁴) During the most recent five year period, just two banks (down from seven last year) have not received a CRA rating from their federal regulator and nine banks (down from twenty-two) have not received a rating from the Division of Banks. (See Table 4.)
- **The number of credit unions with “Outstanding” ratings remained at six (7.1% of the 84 current state-chartered credit unions).** No credit union has received a rating of less than “Satisfactory” since 1997. Just seven ratings were awarded in 2012, one more than the six ratings awarded the previous year. **At the pace of the last two years, it would take almost thirteen years to provide a rating to every credit union in the state. As of year-end 2012, twenty-three credit unions (27.4% of the total) had not received a CRA rating based on exam dated within the last five years;** One Twenty CU’s most recent exam is dated in 2001 and Members Plus CU’s most recent exam is dated in 2003. (Tables 5, 6, and A-3.)
- **Of the ninety licensed mortgage lenders that are currently subject to the state’s Mortgage Lender Community Investment (MLCI) regulation, only five were awarded ratings in 2012 and only 34 have ever received ratings or exams.⁵** One lender has a rating of “High Satisfactory,” thirty-six lenders have ratings of “Satisfactory,” and three lenders have ratings of “Needs to Improve.” Of the 2012 ratings, four were “Satisfactory” and one was “Needs to Improve.” The “Needs to Improve” rating went to Leader Mortgage, which also received a Consent Order for using unlicensed loan originators. None of the four largest licensed mortgage lenders, as ranked by 2012 HMDA data (Mortgage Master, Quicken, Provident Funding, and Guaranteed Rate), have yet

³ The Bank of New York Mellon (New York City), a sister bank to BNY Mellon NA (Pittsburgh), had \$8.8B of deposits in Massachusetts and ranked sixth on the FDIC’s list. However, it is a wholesale bank whose CRA “assessment area” lies entirely within metropolitan New York and it is thus not counted as a Massachusetts bank for purposes of this report.

⁴ An exam of RBS Citizens dated Dec. 31, 2007 did not cover its performance in Massachusetts. The OCC’s CRA Exam Schedule for the second quarter of 2010 indicated that RBS Citizens was scheduled for an exam to begin in April 2010, but no rating or performance evaluation has been made public as of early February 2013.

⁵ Author’s calculation from 2012 HMDA data, which showed that 90 licensed mortgage lenders made fifty or more mortgage loans in the state. Table A-4 shows that of the 45 mortgage lenders examined under MLCI, five did not report any loans in Massachusetts in 2012, five more reported fewer than fifty loans, and one went out of business soon after being awarded a “Substantial Noncompliance” rating in 2009 (See “Note”). Table 7 shows a total of 41 ratings since 2009 (rather than 45) because four of the exams resulted in Consent Orders rather than ratings.

received ratings, but sixteen of the twenty lenders ranked fifth through twenty-fifth have been rated. (See Tables 7 and A-4).

For Additional Information:

- A great deal of information on the CRA (Community Reinvestment Act) in general, and on the CRA evaluation/examination/rating system in particular is readily available on the web sites of the state's Division of Banks (www.state.ma.us/dob) and of the federal bank regulators: the Federal Deposit Insurance Corporation (www.fdic.gov); the Office of the Comptroller of the Currency (www.occ.treas.gov); and the Federal Reserve (www.federalreserve.gov).
- The Mortgage Lender Community Investment (MLCI) regulation (209 CMR 54.00), as well as a list of the MLCI ratings made public so far (with links to the performance evaluations), is available at the Division of Banking's website: www.mass.gov/dob.
- Almost all of the *Performance Evaluations* for Massachusetts banks, credit unions, and licensed mortgage lenders are available in their entirety at the websites of the regulators that prepared them, where they can be read on-line, down-loaded, or printed out. A fourth federal bank regulator, the Office of Thrift Supervision, was merged into the OCC in mid-2011; the CRA section of the OCC website provides a link to the former OTS website for access to its database of OTS ratings and performance evaluations.

TABLE 1
NUMBER & PERCENT OF CRA RATINGS GIVEN TO MASSACHUSETTS BANKS
THAT WERE "OUTSTANDING" OR BELOW "SATISFACTORY" – 1991-2012

Year	Number of Ratings			% Outstanding			% Below Satisfactory*		
	Federal	Mass.	Total	Federal	Mass.	Total	Federal	Mass.	Total
1991	56	54	110	5.4%	3.7%	4.5%	17.9%	20.4%	19.1%
1992	88	109	197	10.2%	12.8%	11.7%	19.3%	18.3%	18.8%
1993	97	55	152	15.5%	12.7%	14.5%	8.2%	7.3%	7.9%
1994	137	38	175	10.2%	23.7%	13.1%	7.3%	2.6%	6.3%
1995	120	119	239	24.2%	24.4%	24.3%	3.3%	0.8%	2.1%
1996	106	98	204	32.1%	34.7%	33.3%	1.0%	1.0%	1.0%
1997	88	71	159	28.4%	29.6%	28.9%	1.1%	0.0%	0.6%
1998	82	77	159	25.6%	24.7%	25.2%	0.0%	0.0%	0.0%
1999	83	78	161	16.9%	25.6%	21.1%	2.4%	0.0%	1.2%
2000	48	50	98	29.2%	20.0%	24.5%	0.0%	0.0%	0.0%
2001	39	38	77	15.4%	15.8%	15.6%	2.6%	2.6%	2.6%
2002	46	37	83	15.2%	21.6%	18.1%	0.0%	0.0%	0.0%
2003	55	23	78	18.2%	34.8%	23.1%	0.0%	0.0%	0.0%
2004	69	30	99	24.6%	26.7%	25.3%	0.0%	0.0%	0.0%
2005	53	41	94	35.8%	26.8%	31.9%	1.9%	0.0%	1.1%
2006	40	32	72	40.0%	28.1%	34.7%	0.0%	0.0%	0.0%
2007	35	19	54	40.0%	26.3%	35.2%	5.7%	0.0%	3.7%
2008	57	37	94	17.5%	13.5%	16.0%	0.0%	0.0%	0.0%
2009	50	25	75	12.0%	12.0%	12.0%	2.0%	0.0%	1.3%
2010	44	26	70	18.2%	15.4%	17.1%	2.3%	0.0%	1.4%
2011	32	34	66	21.9%	20.6%	21.2%	3.1%	2.9%	1.5%
2012	56	44	100	21.4%	18.2%	20.0%	1.8%	0.0%	1.0%

* Since 1993, all ratings below "Satisfactory" have been "Needs to Improve."

**TABLE 2
DISTRIBUTION OF MOST RECENT CRA RATINGS OF MASSACHUSETTS BANKS
BY NUMBER OF RANKINGS AND PERCENT, YEAR-END 1993-2012**

Date	1993	1995	1997	1999	2001	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012
Active Banks	286	257	245	228	220	210	198	194	195	185	179	176	171	165	159
Rated Banks	262	257	243	227	219	207	197	194	192	182	177	173	169	164	159
"Outstanding"	32	57	70	57	47	44	50	51	54	57	49	41	35	32	31
"High Satisfactory" #	n/a	n/a	5	21	21	17	10	6	7	11	7	20	22	24	21
"Satisfactory"	198	196	168	147	150	146	137	136	130	112	119	112	111	106	106
Below "Satisfactory"	32	4	0	2	1	0	0	1	1	2	2	0	1	2	1
% "Outstanding"	12.2%	22.2%	28.8%	25.1%	21.5%	21.3%	25.4%	26.3%	28.1%	31.3%	27.7%	23.7%	20.7%	19.5%	19.5%
% "High Satisfactory" #	n/a	n/a	2.1%	9.3%	9.6%	8.2%	5.1%	3.1%	3.6%	6.0%	4.0%	11.6%	13.0%	14.6%	13.2%
% "Satisfactory"	75.6%	76.3%	69.1%	64.8%	68.5%	70.5%	69.5%	70.1%	67.7%	61.5%	67.2%	64.7%	65.7%	64.6%	66.7%
% Below "Satisfactory"	12.2%	1.6%	0.0%	0.9%	0.5%	0.0%	0.0%	0.5%	0.5%	1.1%	1.1%	0.0%	0.6%	1.2%	0.6%

Note: For increased legibility, the columns for even-numbered years between 1994 and 2002 are not shown in this table.

The rating of "High Sat," first awarded in mid-1997, is available only from Mass. For the 21 banks with a most recent rating of "High Sat," 19 had federal ratings of "Sat" in concurrent federal/state exams; if concurrent exams led to different ratings, the higher is regarded as "most recent."

**TABLE 3
PUBLIC CRA RATINGS OF MASSACHUSETTS BANKS
BY REGULATOR AND RATING, 1993-2012**

	OCC				OTS or Fed*				FDIC				MASS				
	Out	Sat	NI	All	Out	Sat	NI	All	Out	Sat	NI	All	Out	HSat	Sat	NI	All
A. Numbers of Ratings																	
1993	2	12	0	14	0	12	2	14	13	50	6	69	7	*	44	4	55
1994	0	8	0	8	1	10	1	12	13	95	9	117	9	*	28	1	38
1995	1	6	0	7	0	9	1	10	28	72	3	103	29	*	89	1	119
1996	1	6	0	7	4	8	0	12	29	57	1	87	34	*	63	1	98
1997	2	6	0	8	1	5	1	7	22	51	0	73	21	5	45	0	71
1998	0	2	0	2	3	6	0	9	18	53	0	71	19	19	39	0	77
1999	2	2	0	4	2	6	0	8	10	59	2	71	20	15	43	0	78
2000	0	1	0	1	0	1	0	1	14	32	0	46	10	6	34	0	50
2001	0	1	0	1	1	5	0	6	5	26	1	32	6	14	17	1	38
2002	0	1	0	1	0	3	0	3	7	35	0	42	8	10	19	0	37
2003	0	2	0	2	0	3	0	3	8	40	0	48	8	7	8	0	23
2004	0	3	0	3	2	5	0	7	14	44	0	58	8	5	17	0	30
2005	0	4	0	4	3	3	0	6	15	26	1	42	7	4	30	0	41
2006	0	2	0	2	3	2	0	5	12	20	0	32	9	4	19	0	32
2007	2	1	0	3	3	4	0	7	9	14	2	25	5	5	9	0	19
2008	1	2	0	3	1	5	0	6	8	38	0	46	4	10	23	0	37
2009	1	5	0	6	1	4	0	5	3	33	1	37	3	6	16	0	25
2010	0	3	0	3	4	6	1	11	4	24	0	28	4	5	17	0	26
2011	1	1	0	2	2	2	0	4	4	21	0	25	7	8	18	1	34
2012	3	5	0	8	2	4	0	6	7	34	1	42	8	8	28	0	44

B. Percentage Distribution of Ratings by Each Regulator in Each Year																	
1993	14%	86%	0%		0%	86%	14%		19%	72%	9%		13%	0%	80%	7%	
1995	14%	86%	0%		0%	90%	10%		27%	70%	3%		24%	0%	75%	1%	
1997	25%	75%	0%		14%	71%	14%		30%	70%	0%		30%	7%	63%	0%	
1999	50%	50%	0%		25%	75%	0%		14%	83%	3%		26%	19%	55%	0%	
2001	0%	100%	0%		17%	83%	0%		16%	81%	3%		16%	37%	45%	3%	
2003	0%	100%	0%		0%	100%	0%		17%	83%	0%		35%	30%	35%	0%	
2004	0%	100%	0%		29%	71%	0%		24%	76%	0%		27%	17%	57%	0%	
2005	0%	100%	0%		50%	50%	0%		36%	62%	2%		17%	10%	73%	0%	
2006	0%	100%	0%		60%	40%	0%		38%	63%	0%		28%	13%	59%	0%	
2007	67%	33%	0%		43%	57%	0%		36%	56%	8%		26%	26%	47%	0%	
2008	33%	67%	0%		17%	83%	0%		17%	83%	0%		11%	27%	62%	0%	
2009	17%	83%	0%		20%	80%	0%		8%	89%	3%		12%	24%	64%	0%	
2010	0%	100%	0%		36%	55%	9%		14%	86%	0%		15%	19%	65%	0%	
2011	50%	50%	0%		50%	50%	0%		16%	84%	0%		21%	24%	53%	3%	
2012	38%	63%	0%		33%	67%	0%		17%	81%	2%		18%	18%	64%	0%	

Notes: For increased legibility the rows for percentage distributions in even-numbered years between 1994 and 2002 are not shown.
The rating of "High Satisfactory" became available to Mass. regulators -- but not to federal regulators -- in mid-1997.
No Massachusetts bank has received a rating of "Substantial NonCompliance" since 1992.

* Ratings shown through 2010 are those of the OTS, which also gave one rating ("Sat") in 2011 before merging into OCC.
Ratings shown for 2011 and later are those of the Fed, which gave between 0 and 2 ratings per year before 2011.

**TABLE 4
YEAR OF MOST RECENT CRA RATINGS OF MASSACHUSETTS BANKS
BY REGULATOR AND OVERALL, AS OF DECEMBER 31, 2012**

Regulator	Banks* 12/31/11	Last Rated in 2012		Last Rated in 2011		Last Rated in 2010		Last Rated in 2009		Last Rated in 2008		Not in Last 5 Years^	
		#	%	#	%	#	%	#	%	#	%	#	%
FED	18	9	50.0%	4	22.2%	3	16.7%	1	5.6%	0	0.0%	1	5.6%
OCC^	31	8	25.8%	2	6.5%	13	41.9%	4	12.9%	3	9.7%	1	3.2%
FDIC	110	42	38.2%	22	20.0%	21	19.1%	15	13.6%	10	9.1%	0	0.0%
MASS	126	44	34.9%	31	24.6%	24	19.0%	13	10.3%	5	4.0%	9	7.1%
All Banks	159	59	37.1%	35	22.0%	40	25.2%	18	11.3%	6	3.8%	1	0.6%

TABLE 5
DISTRIBUTION OF CURRENT CRA RATINGS OF MASS. CREDIT UNIONS
BY NUMBER OF RANKINGS AND PERCENT, YEAR-END 1992-2012

Year	Rated CU's	Number of Current CRA Ratings				Distribution of Current CRA Ratings			
		OUT	HI SAT	SAT	NI	OUT	HI SAT	SAT	NI
1992	27	0	NA	10	17	0.0%	NA	37.0%	63.0%
1993	29	0	NA	14	15	0.0%	NA	48.3%	51.7%
1994	84	1	NA	59	24	1.2%	NA	70.2%	28.6%
1995	123	2	NA	98	23	1.6%	NA	79.7%	18.7%
1996	123	3	NA	112	8	2.4%	NA	91.1%	6.5%
1997	122	6	0	113	3	4.9%	0.0%	92.6%	2.5%
1998	118	7	4	107	0	5.9%	3.4%	90.7%	0.0%
1999	117	7	6	104	0	6.0%	5.1%	88.9%	0.0%
2000	113	7	6	100	0	6.2%	5.3%	88.5%	0.0%
2001	111	7	8	96	0	6.3%	7.2%	86.5%	0.0%
2002	111	7	8	96	0	6.3%	7.2%	86.5%	0.0%
2003	108	7	10	91	0	6.5%	9.3%	84.3%	0.0%
2004	105	7	11	87	0	6.7%	10.5%	82.9%	0.0%
2005	101	7	10	84	0	6.9%	9.9%	83.2%	0.0%
2006	98	6	10	82	0	6.1%	10.2%	83.7%	0.0%
2007	96	6	10	80	0	6.3%	10.4%	83.3%	0.0%
2008	93	7	10	76	0	7.5%	10.8%	81.7%	0.0%
2009	91	7	12	72	0	7.7%	13.2%	79.1%	0.0%
2010	90	6	15	69	0	6.7%	16.7%	76.7%	0.0%
2011	87	6	14	67	0	6.9%	16.1%	77.0%	0.0%
2012	84	6	14	64	0	7.1%	16.7%	76.2%	0.0%

TABLE 6
DISTRIBUTION OF CRA RATINGS GIVEN TO MASS. CREDIT UNIONS
DURING EACH YEAR, 1991-2012

Year	Number of Ratings Awarded					Distribution of Ratings During Year			
	Total	OUT	HI SAT	SAT	NI	OUT	HI SAT	SAT	NI
1991	4	0	NA	3	1	0.0%	NA	75.0%	25.0%
1992	24	0	NA	7	17	0.0%	NA	29.2%	70.8%
1993	11	0	NA	9	2	0.0%	NA	81.8%	18.2%
1994	72	1	NA	51	20	1.4%	NA	70.8%	27.8%
1995	62	3	NA	48	11	4.8%	NA	77.4%	17.7%
1996	65	2	NA	60	3	3.1%	NA	92.3%	4.6%
1997	50	3	0	47	0	6.0%	0.0%	94.0%	0.0%
1998	63	2	3	58	0	3.2%	4.8%	92.1%	0.0%
1999	38	1	2	35	0	2.6%	5.3%	92.1%	0.0%
2000	29	4	1	24	0	13.8%	3.4%	82.8%	0.0%
2001	25	1	5	19	0	4.0%	20.0%	76.0%	0.0%
2002	25	0	1	24	0	0.0%	4.0%	96.0%	0.0%
2003	21	4	2	15	0	19.0%	9.5%	71.4%	0.0%
2004	18	0	2	16	0	0.0%	11.1%	88.9%	0.0%
2005	10	0	0	10	0	0.0%	0.0%	100.0%	0.0%
2006	13	2	0	11	0	15.4%	0.0%	84.6%	0.0%
2007	10	1	2	7	0	10.0%	20.0%	70.0%	0.0%
2008	29	2	3	24	0	6.9%	10.3%	82.8%	0.0%
2009	16	1	3	12	0	6.3%	18.8%	75.0%	0.0%
2010	10	0	5	5	0	0.0%	50.0%	50.0%	0.0%
2011	6	0	0	6	0	0.0%	0.0%	100.0%	0.0%
2012	7	1	1	5	0	14.3%	14.3%	71.4%	0.0%

One of the state's 84 state-chartered credit unions has its most recent rating based on an exam dated in 2001; one more had its most recent exam dated in 2003; one in 2004; three in 2005; six in 2006; and eleven in 2007.

TABLE 7
RATINGS^ OF LICENSED MORTGAGE LENDERS, 2009-2012

Year	Number of Ratings						Percent of Ratings				
	Total	Out	HS	Sat	NI	SNC	Out	HS	Sat	NI	SNC
2009*	6	0	0	5	0	1	0.0%	0.0%	83.3%	0.0%	16.7%
2010	14	0	1	12	1	0	0.0%	7.1%	85.7%	7.1%	0.0%
2011	16	0	0	15	1	0	0.0%	0.0%	93.8%	6.3%	0.0%
2012	5	0	0	4	1	0	0.0%	0.0%	80.0%	20.0%	0.0%

* 2009 was a partial year -- October to December only.

^ Table does not include four exams that resulted in consent orders rather than ratings -- see Table A-4.

Note: a list of individual lenders and their ratings, together with links to their performance evaluations, is available at: www.mass.gov/dob. Click on: "Loans & Mortgages," then "CRA for Mortgage Lenders."

**TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2012 (page 1 of 4)**

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
Abington Bank	Abington	yes	SAT	Nov-09	08/24/09	Fed	SAT	Jan-10	08/24/09
Adams Community Bank*	Adams	yes	SAT	Mar-09	12/08/08	FDIC	SAT	May-09	12/08/08
AtholSB	Athol	yes	HS	Sep-11	03/30/11	FDIC	SAT	Oct-11	03/30/11
Avidia Bank	Hudson	yes	SAT	Aug-10	04/05/10	FDIC	SAT	Oct-10	04/05/10
Avon Coop Bank	Avon	yes	SAT	Apr-12	01/17/12	Fed	SAT	Jan-12	04/30/12
Bank of America#	CharlotteNC	no				OCC	OUT	Oct-10	03/31/09
Bank of Canton(was Canton IfS)	Canton	yes	HS	Sep-06	04/10/06	FDIC	SAT	Jul-11	12/23/10
Bank of CapeCod	Hyannis	yes	SAT	Feb-12	08/29/11	FDIC	SAT	Mar-12	08/22/11
Bank of Easton	North Easton	yes	SAT	Jan-11	10/05/10	Fed	SAT	Dec-10	10/04/10
BankFive	Fall River	yes	OUT	Aug-12	03/26/12	FDIC	OUT	Oct-12	03/26/12
BankGloucester*	Gloucester	yes	HS	May-11	02/14/11	FDIC	SAT	Mar-09	10/17/07
BarreSB	Barre	yes	SAT	May-08	03/12/08	FDIC	SAT	Jul-08	03/12/08
Bay State SB	Worcester	yes	OUT	Jan-12	05/06/11	FDIC	OUT	Feb-12	05/09/11
BayCoast Bank*	Fall River	yes	HS	Apr-11	11/15/10	FDIC	SAT	May-11	11/15/10
BelmontSB	Belmont	yes	SAT	Mar-12	08/10/11	FDIC	SAT	May-12	08/10/11
Berkshire Bank	Pittsfield	yes	HS	Dec-09	02/02/09	FDIC	SAT	Jan-10	02/02/09
Beverly Coop Bank	Beverly	yes	SAT	Jul-12	02/13/12	FDIC	SAT	Aug-12	02/13/12
Blue Hills Bank*	Boston	yes	SAT	Oct-13	05/25/12	FDIC	SAT	Dec-12	05/29/12
BNY Mellon, NA	Pittsburgh PA	no				OCC	OUT	none	04/27/09
Boston Private B&T	Boston	yes	OUT	Feb-12	06/20/11	FDIC	OUT	Mar-12	08/15/11
Braintree Coop Bank	Braintree	yes	SAT	Sep-10	05/24/10	FDIC	SAT	Nov-08	06/23/08
Bridgewater SB	Bridgewater	yes	SAT	Jul-11	12/13/10	FDIC	SAT	Aug-11	12/13/10
Bristol County SB	Taunton	yes	OUT	Jul-10	10/19/09	FDIC	OUT	Sep-10	10/19/09
Brookline Bank^^	Brookline	yes				Fed	SAT	Apr-12	01/23/12
CambridgeSB	Cambridge	yes	OUT	Sep-11	04/25/11	FDIC	SAT	Nov-11	04/25/11
Cambridge TrustCo	Cambridge	yes	SAT	Jun-11	01/25/11	FDIC	SAT	Aug-11	01/25/11
Canton Coop Bank	Canton	yes	SAT	Jun-12	02/27/12	Fed	SAT	Jun-12	02/27/12
Cape Ann SB	Gloucester	yes	HS	Oct-12	06/04/12	FDIC	SAT	Dec-12	06/04/12
Cape Cod Coop Bank	Yarmouth Port	yes	SAT	Feb-12	05/02/11	FDIC	SAT	Mar-12	05/16/11
Cape Cod Five Cents SB	Harwich Port	yes	OUT	Mar-11	09/17/10	FDIC	OUT	Apr-11	09/17/10
Century B&T	Somerville	yes	SAT	Nov-11	06/06/11	FDIC	SAT	Sep-08	11/21/07
Charles River Bank *	Medway	yes	SAT	Jul-08	03/31/08	Fed	SAT	Dec-11	06/06/11
Chelsea Bank	Chelsea	yes	HS	Feb-10	11/30/09	Fed	SAT	Mar-10	11/30/09
ChicopeeSB	Chicopee	yes	OUT	Jan-11	12/21/09	FDIC	OUT	Mar-11	12/21/09
CitiBank (in MA fall 2006) #	New York	no				OCC	OUT	not yet	07/26/10
Clinton SB	Clinton	yes	SAT	Nov-10	02/01/10	FDIC	SAT	Jan-11	02/01/10
Colonial Coop Bank	Gardner	yes	HS	Jul-07	03/12/07	FDIC	SAT	Mar-10	09/10/09
Colonial FSB^	Quincy	no				OCC	SAT	Apr-10	12/15/09
Commerce B&T	Worcester	yes	SAT	Nov-11	05/02/11	FDIC	SAT	Dec-11	04/21/11
Commonwealth Coop Bank * ^	Boston	yes	SAT	Jan-08	10/29/07	OCC	SAT	Jul-08	04/10/08
Cooperative Bank, The	Boston	yes	SAT	Aug-10	03/08/10	FDIC	SAT	Oct-10	03/08/10
Country BfS	Ware	yes	SAT	Dec-09	07/27/09	FDIC	SAT	Feb-13	07/24/12
Dean Coop Bank	Franklin	yes	SAT	Sep-12	03/30/12	FDIC	SAT	Oct-12	03/29/12
Dedham Inst for Savings	Dedham	yes	SAT	Mar-02	06/20/11	FDIC	SAT	Apr-12	06/20/11
Eagle Bank	Everett	yes	HS	Dec-12	07/02/12	FDIC	SAT	Jan-13	07/02/12

**TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2012 (page 2 of 4)**

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
East Boston SB	Boston	yes	SAT	Jun-12	11/17/11	FDIC	SAT	Aug-12	11/17/11
East Cambridge SB	Cambridge	yes	SAT	Oct-10	06/01/10	FDIC	SAT	Dec-10	06/01/10
Eastern Bank	Boston	yes	OUT	Dec-11	06/20/11	FDIC	OUT	Jan-12	06/20/11
Easthampton SB	Easthampton	yes	SAT	Jun-12	12/19/11	FDIC	SAT	Jul-12	12/19/11
Edgartown NB	Edgartown	no				OCC	SAT	Apr-09	12/09/08
Enterprise B&T	Lowell	yes	SAT	Jul-11	11/01/10	FDIC	SAT	Sep-11	11/01/10
Equitable Coop Bank	Lynn	yes	SAT	Dec-10	08/16/10	FDIC	SAT	Sep-08	04/28/08
Everett Coop Bank	Everett	yes	OUT	Jun-05	03/21/05	FDIC	SAT	Jan-10	08/03/09
Family Federal Savings^	Fitchburg	no				OCC	SAT	Sep-08	06/18/08
Family First Bank	Ware	yes	SAT	Jan-09	09/19/08	FDIC	SAT	Nov-11	04/04/11
Fidelity Coop Bank	Fitchburg	yes	SAT	May-10	02/01/10	FDIC	SAT	Aug-10	02/01/10
First Commons Bank	Newton	no				OCC	SAT	Aug-12	05/29/12
First FSB of Boston^	Boston	no				OCC	OUT	May-10	02/08/10
First Ipswich Bank^^	Ipswich	yes				Fed	SAT	Jul-11	01/03/11
First Republic Bank#	San Francisco	no				FDIC	SAT	Jun-12	10/31/11
First Trade Union SB	Boston	no				OCC	SAT	Feb-12	10/31/11
Florence SB	Florence	yes	HS	Jan-12	06/27/11	FDIC	SAT	Jan-12	06/27/11
Foxboro Federal S&L^	Foxboro	no				OCC	SAT	Sep-08	07/07/08
Georgetown SB^	Georgetown	no				OCC	SAT	Apr-10	01/25/10
Granite SB	Rockport	yes	SAT	Sep-06	10/06/06	FDIC	SAT	Dec-09	06/09/09
Greenfield Coop Bank^^	Greenfield	yes	OUT	Aug-12	03/30/12	Fed	OUT	Oct-12	03/30/12
Greenfield SB	Greenfield	yes	OUT	Sep-08	02/19/08	FDIC	SAT	May-12	08/08/11
Hampden Bank	Springfield	yes	OUT	Apr-12	08/15/11	FDIC	OUT	Apr-12	08/15/11
Haverhill Bank	Haverhill	yes	SAT	Oct-09	06/01/09	FDIC	SAT	Dec-09	06/01/09
Hingham Inst for Savings	Hingham	yes	SAT	Dec-12	03/30/12	FDIC	SAT	Dec-12	03/30/12
Holbrook Coop Bank	Holbrook	yes	SAT	May-06	02/21/06	FDIC	SAT	Jul-09	02/24/09
Hometown Bank	Webster	yes	SAT	Jul-06	05/02/06	FDIC	SAT	Feb-10	03/16/10
Hoosac Bank	North Adams	yes	SAT	Aug-12	01/22/12	FDIC	SAT	Sep-12	12/20/11
Inst for Savings	Newburyport	yes	SAT	Jun-12	08/15/11	FDIC	SAT	Mar-12	08/15/11
Leader Bank, NA	Arlington	no				OCC	SAT	Jun-10	03/16/10
Lee Bank	Lee	yes	SAT	Nov-11	05/31/11	FDIC	SAT	Dec-11	05/17/11
Lenox NB	Lenox	no				OCC	SAT	Mar-08	01/07/08
Lowell Coop Bank	Lowell	yes	SAT	Jun-11	01/18/11	FDIC	SAT	Aug-11	01/18/11
Lowell Five Cents SB	Lowell	yes	SAT	Mar-12	10/05/11	FDIC	SAT	Apr-12	10/05/11
Mansfield Coop Bank	Mansfield	yes	SAT	Jun-12	12/14/11	FDIC	SAT	Jul-12	12/14/11
Marblehead SB	Marblehead	yes	OUT	Apr-09	02/17/09	Fed	OUT	May-09	02/17/09
Marlborough SB	Marlborough	yes	HS	Mar-10	11/02/09	FDIC	SAT	May-10	11/02/09
Martha's Vineyard SB	Edgartown	yes	OUT	Sep-10	04/30/10	FDIC	OUT	Oct-10	04/30/10
Mayflower Coop Bank	Middleborough	yes	OUT	May-09	03/09/09	FDIC	OUT	Jul-09	03/09/09
Mechanics Coop Bank	Taunton	yes	HS	May-11	01/24/11	FDIC	SAT	Jul-11	01/24/11
Meetinghouse Coop Bank	Boston	yes	SAT	Aug-05	05/13/05	FDIC	SAT	Jun-09	01/05/09
Melrose Coop Bank	Melrose	yes	SAT	Apr-09	01/22/09	FDIC	SAT	Jun-09	01/22/09
Merrimac SB	Merrimac	yes	SAT	Nov-10	07/26/10	FDIC	SAT	May-08	02/14/11
Methuen Coop Bank	Methuen	yes	SAT	Apr-07	12/28/06	FDIC	SAT	Oct-08	06/30/08
Middlesex Fed Savings, FA^	Somerville	no				OCC	SAT	Sep-12	06/18/12

TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2012 (page 3 of 4)

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
Middlesex SB	Natick	yes	OUT	Aug-10	11/30/09	FDIC	OUT	Oct-10	11/30/09
Milford Federal S&L^	Milford	no				OCC	SAT	Dec-09	10/05/09
Milford NB	Milford	no				OCC	SAT	May-10	01/25/10
Millbury NB	Millbury	no				OCC	SAT	Jul-09	03/04/09
Millbury SB	Millbury	yes	SAT	Sep-10	06/07/10	FDIC	SAT	Apr-08	11/08/07
Monson SB	Monson	yes	SAT	Nov-11	12/20/10	FDIC	SAT	Aug-08	03/31/08
Mutual FSB of Plymouth Co^	Whitman	no				OCC	SAT	Mar-10	11/23/09
Mutual One Bank*	Framingham	yes	SAT	Oct-12	05/07/12	FDIC	SAT	Nov-12	04/23/12
National Grand Bank	Marblehead	no				OCC	SAT	Jan-10	08/24/09
Needham Bank	Needham	yes	SAT	Apr-11	11/15/10	Fed	SAT	Apr-11	11/15/10
Newburyport Five Cents SB	Newburyport	yes	HS	Oct-12	06/04/12	FDIC	SAT	Dec-12	06/04/12
North Brookfield SB	No. Brookfield	yes	SAT	Nov-10	06/30/10	FDIC	SAT	Jan-11	06/30/10
North Cambridge Coop Bank	Cambridge	yes	SAT	Apr-10	01/11/10	FDIC	SAT	Jun-10	01/11/10
North Easton SB	North Easton	yes	SAT	Sep-11	03/14/11	FDIC	SAT	Oct-11	03/14/11
North Middlesex SB	Ayer	yes	HS	Feb-12	09/06/11	FDIC	SAT	Apr-12	06/06/11
North Shore Bank	Peabody	yes	SAT	Jun-10	02/16/10	FDIC	SAT	Aug-10	02/16/10
Northampton Coop Bank	Northampton	yes	SAT	Dec-12	08/13/12	Fed	SAT	Dec-12	08/13/12
Northern B&T	Woburn	yes	SAT	Feb-11	09/30/10	FDIC	SAT	Apr-11	09/30/10
Northmark Bank	N. Andover	yes	SAT	Aug-12	03/19/12	FDIC	SAT	Oct-12	03/19/12
Norwood Coop Bank	Norwood	yes	SAT	Sep-10	05/17/10	FDIC	SAT	Nov-10	05/17/10
Nuvo B&T [new April 2008]	Springfield	yes	SAT	Aug-10	04/26/10	FDIC	SAT	Oct-10	04/26/10
One United Bank	Boston	yes	NI	Dec-11	10/04/10	FDIC	NI	Jan-12	10/04/10
Patriot Community Bank	Woburn	yes	SAT	Aug-11	03/21/11	FDIC	SAT	Oct-11	03/21/11
Pentucket Bank	Haverhill	yes	HS	Oct-09	03/23/09	FDIC	SAT	Dec-09	03/23/09
Peoples Bank	Holyoke	yes	HS	Jul-12	11/07/11	FDIC	SAT	Jul-12	11/07/11
Peoples Federal SB^	Boston	no				OCC	OUT	May-11	02/14/11
People's United Bank# ^	Bridgeport CT	no				OCC	OUT	Sep-10	10/05/09
Pilgrim Bank	Cohasset	yes	SAT	Apr-11	02/16/10	FDIC	SAT	Jul-11	02/16/10
Pittsfield Coop Bank	Pittsfield	yes	HS	Dec-08	09/17/08	FDIC	SAT	Feb-09	09/17/08
Provident Bank	Amesbury	yes	SAT	Sep-10	05/10/10	FDIC	SAT	Nov-10	05/10/10
Randolph SB	Randolph	yes	SAT	Apr-12	07/11/11	FDIC	SAT	Apr-13	07/19/11
RBS Citizens Bank, NA # ^^	Providence RI	no				OCC	OUT	Feb-04	12/02/02
Reading Coop Bank ^^	Reading	yes	SAT	Jan-12	09/12/11	Fed	SAT	Oct-06	06/12/06
Rockland Trust Co	Rockland	yes	OUT	Mar-12	12/27/10	FDIC	OUT	Apr-12	12/27/10
Rockport NB	Rockport	no				OCC	SAT	Jul-09	04/06/09
Rollstone B&T * ^	Fitchburg	no				OCC	OUT	Dec-10	04/19/10
Salem Five Cents SB	Salem	yes	HS	Jul-10	03/08/10	FDIC	SAT	Sep-10	03/08/10
Saugus Bank	Saugus	yes	SAT	Feb-12	09/12/11	FDIC	SAT	Apr-12	09/12/11
Savers Coop Bank	Southbridge	yes	HS	Jan-12	11/22/10	FDIC	SAT	Mar-12	11/22/10
Savings Bank, The	Wakefield	yes	SAT	May-10	07/20/09	FDIC	SAT	Jul-10	07/20/09
S-Bank	Weymouth	yes	SAT	Jan-12	07/18/11	FDIC	SAT	Feb-12	07/25/11
Scituate FSB^	Scituate	no				OCC	OUT	Dec-12	10/01/12
Seamen's Bank	Provincetown	yes	HS	Jul-12	12/20/11	FDIC	SAT	Jul-12	12/20/11
South Coastal Bank	Rockland	yes	SAT	Aug-12	01/22/12	FDIC	SAT	Sep-12	12/30/11
South Shore SB	Weymouth	yes	SAT	Oct-12	04/09/12	Fed	SAT	Aug-12	04/09/12

TABLE A-1
CURRENT CRA RATINGS OF MASS. BANKS AS OF DEC. 31, 2012 (page 4 of 4)

Bank	City/Town	Mass Reg?	Mass Rating	Mass List	Mass ExamDate	Fed Reg	Fed Rating	Fed List	Fed ExamDate
Southbridge SB	Southbridge	yes	HS	Dec-11	06/13/11	FDIC	SAT	Jan-12	06/20/11
Sovereign Bank # ^	Pennsylvania	no				OCC	OUT	Mar-12	09/28/10
Spencer SB	Spencer	yes	HS	Mar-11	10/18/10	FDIC	SAT	May-11	10/18/10
State Street B&T	Boston	yes	OUT	May-11	01/18/11	Fed	OUT	May-11	01/18/11
Stoneham SB	Stoneham	yes	SAT	May-09	01/12/09	FDIC	SAT	Jul-09	01/12/09
StonehamBank	Stoneham	yes	SAT	Oct-09	05/26/09	FDIC	SAT	Dec-09	05/26/09
Stoughton Coop Bank^^	Stoughton	yes	SAT	Oct-12	05/21/12	Fed	SAT	Dec-12	05/21/12
TD Bank #	Wilmington DE	no				OCC	OUT	Dec-12	12/31/11
UniBank for Savings	Whitinsville	yes	SAT	Apr-12	08/22/11	FDIC	SAT	Apr-12	08/22/11
United Bank^	W. Springfield	no				OCC	SAT	Jan-13	10/29/12
Village Bank	Newton	yes	SAT	Jun-12	01/17/12	FDIC	SAT	Aug-12	01/17/12
Wakefield Coop Bank	Wakefield	yes	SAT	Aug-09	06/09/09	FDIC	SAT	Sep-09	06/09/09
Walpole Coop Bank	Walpole	yes	OUT	Mar-12	11/14/11	Fed	OUT	Mar-12	11/14/11
Washington SB	Lowell	yes	HS	Jan-11	09/20/10	FDIC	SAT	Jun-08	02/19/08
Watertown SB	Watertown	yes	OUT	Oct-12	06/04/12	Fed	OUT	Oct-12	06/04/12
Webster Bank, NA #	Waterbury CT	no				OCC	SAT	Mar-12	02/07/11
Webster Five Cents SB	Webster	yes	OUT	Aug-10	12/21/09	FDIC	OUT	Oct-10	12/21/09
Wellesley Bank	Wellesley	yes	SAT	Aug-11	04/13/11	FDIC	SAT	Feb-09	09/02/08
Westfield FSB ^	Westfield	no				OCC	SAT	Oct-10	04/05/10
Weymouth Bank	Weymouth	yes	SAT	May-10	01/25/10	FDIC	SAT	Jul-10	01/25/10
Winchester Coop Bank	Winchester	yes	SAT	Aug-11	03/14/11	FDIC	SAT	Oct-11	03/14/11
Winchester SB	Winchester	yes	SAT	Dec-11	07/11/11	FDIC	SAT	Feb-12	07/11/11
Winter Hill Federal S&L^	Somerville	no				OCC	OUT	Dec-10	06/08/10
Wrentham Coop Bank	Wrentham	yes	SAT	Aug-11	05/02/11	FDIC	SAT	Jan-09	09/29/08

* indicates banks with potentially confusing recent name changes within the last four years:

- Adams Community Bank was, until February 2012, South Adams SB
- BayCoast Bank was, until January 2012, Citizens-Union SB
- Blue Hills Bank was, until November 2011, Hyde Park SB
- Charles River Bank was, until January 2009, Medway Coop Bank;
- Commonwealth Coop Bank was, until January 2009, Hyde Park Coop
- MutualOne Bank was, until July 2012, Framingham Cooperative Bank
- S-Bank was, until August 2009, South Shore Cooperative Bank;

indicates nine banks that are headquartered outside of Massachusetts (CRA ratings shown are for performance within Mass.)
See Table A-2 and its notes for more detailed info on all banks with branches both inside and outside of Mass.

^ indicates banks that were regulated by the OTS before that agency was merged into the OCC in July 2011 and for whom the most recent CRA rating is from the OTS.

^^ indicates banks that have changed charters and have CRA ratings from former regulators

RBS Citizens Bank (a national bank) absorbed Citizens Bank of Mass. on 9/1/07; federal rating shown is from the FDIC.
the most recent OCC rating of RBS Citizens Bank, dated 12/31/07, does not cover Mass.

Of this banks in this category that now have the Fed as their federal regulator, Brookline Bank and First Ipswich Bank
formerly had the OCC as their federal regulator; the others had the FDIC as their federal regulator.

TABLE A-2
BANKS WITH BRANCHES BOTH INSIDE AND OUTSIDE OF MASSACHUSETTS
(Data as of June 30, 2012)

Bank Name	Headquarters	Branches			Deposits (\$ millions)		
		Mass.	Other	Mass. %	Mass.	Other	Mass. %
A. Banks with Massachusetts Headquarters							
Berkshire Bank	Pittsfield	33	38	46.5%	1,931	1,490	56.4%
Boston Private B&T	Boston	11	13	45.8%	2,906	1,805	61.7%
Bristol County SB	Taunton	12	1	92.3%	972	47	95.4%
BayCoast Bank	Fall River	14	1	93.3%	713	40	94.7%
Enterprise B&T	Lowell	16	4	80.0%	1,328	126	91.3%
First Trade Union Bank, FSB	Boston	3	1	75.0%	432	22	95.2%
Lowell Five Cents SB	Lowell	13	1	92.9%	668	2	99.7%
Merrimac SB	Merrimac	1	1	50.0%	37	19	66.1%
Milford Federal S&L	Milford	3	1	75.0%	265	41	86.6%
OneUnited Bank	Boston	3	6	33.3%	26	306	7.8%
Pentucket Bank	Haverhill	3	2	60.0%	440	110	80.0%
Provident Bank	Amesbury	3	4	42.9%	264	173	60.4%
Randolph SB	Randolph	5	2	71.4%	286	44	86.7%
Total, 13 Banks		120	75	61.5%	10,268	4,225	70.8%
B. Banks with Non-Massachusetts Headquarters							
Admirals Bank	Cranston RI	6	1	85.7%	78	488	13.8%
Bank of America, NA#	Charlotte NC	264	5,392	4.7%	54,711	936,974	5.5%
Bank of New England	Salem NH	3	6	33.3%	95	318	23.0%
Bank of New York Mellon	New York NY	1	4	20.0%	8,773	108,156	7.5%
Beacon Federal	E. Syracuse NY	1	6	14.3%	77	605	11.3%
Beal Bank, SSB	Plano, TX	1	17	5.6%	0.0	3,152	0.0%
BNY Mellon, NA#	Pittsburgh PA	1	18	5.3%	3,385	7,544	31.0%
Cathay Bank	Los Angeles CA	1	48	2.0%	57	7,078	0.8%
CitiBank, NA #	Sioux Falls SD	31	1,027	2.9%	1,742	392,922	0.4%
East West Bank	Pasadena CA	3	119	2.5%	223	16,573	1.3%
<i>NBT Bank, NA</i>	<i>Norwich NY</i>	<i>5</i>	<i>132</i>	<i>3.6%</i>	<i>130</i>	<i>4,580</i>	<i>2.8%</i>
First Niagara Bank, NA	Buffalo NY	13	456	2.8%	343	27,753	1.2%
First Republic Bank#	San Francisco CA	4	59	6.3%	2,158	22,057	8.9%
Northeast Community Bank	White Plains NY	2	5	28.6%	117	210	35.8%
<i>Northern Trust Co</i>	<i>Chicago IL</i>	<i>1</i>	<i>75</i>	<i>1.3%</i>	<i>47</i>	<i>35,485</i>	<i>0.1%</i>
People's United Bank#	Bridgeport CT	55	360	13.3%	3,201	18,267	14.9%
RBS Citizens NA#	Providence RI	254	766	24.9%	30,907	44,593	40.9%
Salem Coop Bank	Salem NH	1	1	50.0%	55	224	19.7%
Salisbury B&T	Lakeville CT	2	6	25.0%	45	443	9.2%
Sovereign Bank#	Wilmington DE^	229	492	31.8%	18,906	29,429	39.1%
TD Bank, NA#	Wilmington DE^	153	1,156	11.7%	10,803	148,495	6.8%
TrustCo Bank	Schenectady NY	4	133	2.9%	26	3,873	0.7%
Webster Bank, NA#	Waterbury CT	22	144	13.3%	1,336	12,839	9.4%
Total, 23 Banks		1,057	10,423	9.2%	137,215	1,822,058	7.0%

Source: FDIC, Summary of Deposits data, as of June 30, 2012 (www.fdic.gov).

This report classifies these nine banks as "Massachusetts banks"; see second paragraph of report and footnote to Table A-1.

Also: This table ignores trust or investment banks with only branches that have no or minimal deposits.

Banks shown in *italics* were not on in this table last year.

**TABLE A-4
PERFORMANCE RATINGS OF LICENSED MORTGAGE LENDERS UNDER
THE MORTGAGE LENDER COMMUNITY INVESTMENT REGULATION
(CRA FOR MORTGAGE LENDERS), 2009-2012**

Lender	Headquarters	Rating	List Date	Exam Date	2011 Rank Among LMLs [^]
Advanced Mortgage Services	Norwell MA	SAT	Mar-10	12/01/09	41
American Interbank Mortgage	Irvine CA	NA*	NA*	11/26/10	65
American Internet Mortgage	San Diego CA	SAT	Jul-10	08/31/09	44
Amerisave Mortgage Corp.	Atlanta GA	NA*	NA*	01/27/10	23
Atlantic Home Lending	Canton MA	SAT	Jan-12	12/07/10	48
Broker Solutions	Irvine CA	SAT	Jun-12	06/02/11	NL
Continental Homes Loan	Melville NY	SAT	Jun-12	03/02/12	75
Embrace Home Loans	Newport RI	SAT	May-10	02/02/10	40
First Residential Mortgage Network	Louisville KY	SAT	May-11	11/01/10	BT
Franklin American Mortgage Co.	Franklin TN	SAT	Nov-10	06/09/10	15
Franklin First Financial	Melville NY	SAT	Nov-11	04/12/11	BT
Freedom Mortgage Corp.	Mt. Laurel NJ	SAT	May-10	12/11/09	55
Gateway Funding Diversified Mort Svcs	Horsham PA	SAT	Jan-11	12/11/09	57
Greenpark Mortgage Corp.	Needham MA	SAT	Dec-10	06/20/10	5
Homestead Funding Corp.	Albany NY	SAT	Jul-11	12/22/10	87
iFreedom Direct Corp.	Salt Lake City UT	SAT	Jul-11	02/03/11	71
Leader Mortgage Co.	Arlington MA	N#	none	08/03/10	13
Members Mortgage Co.	Woburn MA	SAT	Nov-11	05/16/11	30
Merrimack Mortgage Co.	Manchester NH	SAT	Jan-11	09/07/10	12
Metro Boston Mortgage Co.	Canton MA	SAT	Nov-10	04/20/10	NL
MLD Mortgage	Florham Park NJ	SAT	Nov-11	03/24/11	BT
Monument Mortgage Co.	Lexington MA	SAT	Oct-09	04/21/09	NL
Mortgage Financial	Twinsbury MA	SAT	Apr-11	09/07/10	20
Mortgage Network	Danvers MA	NA*	NA*	08/25/09	10
Mortgage Partners	Amherst NH	SAT	Sep-10	4/20/10	NL
MSA Mortgage	Winthrop MA	SAT	Dec-09	06/30/09	9
Nationstar Mortgage	Lewisville TX	NA*	NA*	11/30/11	36
NE Moves Mortgage	Waltham MA	SAT	Jan-10	07/29/09	8
NFM	Linthicum MD	SAT	Nov-11	05/23/11	70
Omega Mortgage Corp.	Sudbury MA	SAT	Sep-10	05/10/10	NL
Plaza Home Mortgage	San Diego CA	NI	Sep-10	05/10/10	27
Polimortgage Group	Norwood MA	NI	Oct-11	03/03/11	7
Primary Residential Mortgage	Salt Lake City UT	SAT	Nov-11	07/13/11	BT
Pulte Mortgage	Englewood CA	SAT	Aug-10	03/02/10	74
Radius Financial Group	Norwell MA	SAT	Nov-09	06/30/09	16
Regency Mortgage Corp.	Manchester NH	SAT	Dec-11	06/30/11	BT
Reliant Mortgage Co.	Beverly MA	SAT	Feb-11	11/08/10	11
Ross Mortgage Co.	Westborough MA	SAT	Oct-09	04/29/09	45
Shamrock Financial Corp.	East Providence RI	SAT	Nov-09	06/22/09	56
Sierra Pacific Mortgage Co.	Folsom CA	SAT	Aug-10	02/15/10	18
Stearns Lending	Santa Ana CA	SAT	Oct-12	12/06/11	24
Suntrust Mortgage	Richmond VA	HS	Sep-10	03/11/10	22
Superior Mortgage Corp.	Hammon ton NJ	SAT	May-11	11/08/10	32
William Raveis Mortgage	Shelton CT	SAT	Sep-11	10/12/10	21

[^] Lenders are ranked by total number of Massachusetts loans reported in 2011 HMDA data. In that year, 174 licensed lenders reported one or more loans, with 90 of these reporting fifty or more loans. In this column, **BT** indicates that the lender's 2011 HMDA-reported loans were Below the Threshold of 50; **NL** indicates no loans reported in HMDA.

Leader Mortgage's exam also resulted in the issuance of a Consent Order from the Div. of Banks, dated March 16, 2012.

NA*: These exams resulted in not in ratings but in Consent Orders that required these lenders to rectify "substantial noncompliance with applicable federal and state statutes, rules, and regulations," including incomplete loan records and inaccurate HMDA reporting that made an evaluation of lending performance impossible.

Note: In addition to the current lenders shown in the table, Union Capital Mortgage was issued a Cease and Desist together with a rating of Substantial Noncompliance on Nov. 12, 2009 as a result of its MLCI examination; it soon thereafter went out of business. Some of the lenders listed above also be no longer active in Massachusetts; no attempt has been made to identify such lenders.