PUBLIC DISCLOSURE

July 19, 2010

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Ally Bank
Certificate Number 57803

6985 Union Park Center, Suite 435
Midvale, Utah 84047

Federal Deposit Insurance Corporation
350 Fifth Avenue
New York, New York 10118

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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GENERAL INFORMATION

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

This document is an evaluation of the Community Reinvestment Act (CRA) performance of ***Ally Bank*** *prepared by the* ***Federal Deposit Insurance Corporation (FDIC)****, the institution's supervisory agency, as of* ***July 19, 2010.*** *The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 345.*

INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The following table indicates the performance level of Ally Bank with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	**Ally Bank**		
	PERFORMANCE TESTS		
	Lending Test (*)	**Investment Test**	**Service Test**
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
Needs to Improve			
Substantial Noncompliance			

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

This rating is based on the following factors:

Lending Test

- The bank's lending levels reflect good responsiveness to assessment area credit needs.
- Due to the bank's national lending focus, only a small percentage of loans were originated or purchased inside of the designated assessment area. Although the percentage of home mortgage loans in the assessment area was small, the number and dollar volume of the loans that comprised this percentage was significant enough to draw meaningful conclusions regarding Ally Bank's CRA performance. Due to a limited volume of small business loans in the assessment area, no further analysis was conducted.

- The geographic distribution of loans reflects adequate penetration throughout the assessment area.
- The distribution of borrowers reflects, given the demographics of the assessment area, adequate penetration among individuals of different income levels.
- The bank originated an adequate level of community development loans.
- The bank makes limited use of innovative and flexible loan products in order to serve the current credit needs of the community.

Investment Test

- The bank has obtained a significant level of qualified investments exhibiting adequate responsiveness to assessment area credit needs.
- The bank occasionally uses complex investments to support community development initiatives.

Service Test

- Ally Bank does not operate any retail banking offices that are open to the public.
- A variety of alternative delivery systems are available.
- The bank provided an adequate level of community development services.

SCOPE OF EXAMINATION

Ally Bank's (Ally) performance was reviewed using the Large Bank CRA evaluation procedures. Individual ratings for the Lending, Investment, and Service Tests are displayed on the matrix on page three of this performance evaluation. The evaluation of this institution's performance is based on a review of its Home Mortgage Disclosure Act (HMDA) and small business lending for 2008 and 2009. Ally does not engage in agricultural lending. Therefore, small farm loans were not included in the analysis of Ally's lending. Ally did not collect consumer lending information for analysis purposes and did not request that this category of loans be reviewed during the current CRA evaluation. Ally's small business lending, which consists entirely of purchased vehicle loans, is widely distributed throughout the United States. As a result, a small number of these loans were located in the designated assessment area. Small business lending data has been presented in the analysis of the bank's assessment area concentration for informational purposes. However, no further analysis of assessment area performance was conducted for geographic distribution or borrower profile. Further, since the small business loans were purchased by the bank, revenue data for the applicable businesses was not available for review.

In accordance with the CRA regulation, Ally has designated an assessment area consisting of contiguous political subdivisions surrounding its main office. Although the percentage of home mortgage lending in the designated assessment area is small (1.4 percent), the volume of loans is great enough to draw meaningful conclusions in regards to Ally's CRA performance. In addition, a broader analysis of Ally's national lending was conducted to demonstrate that the bank's overall performance was consistent with its lending in the designated assessment area. The national lending review encompassed geographic areas that represented approximately 50 percent of the bank's HMDA lending and 30 percent of small business lending.

All tables contained in the Borrower Profile and Geographic Distribution of Lending sections reference loans in terms of number. Loan data by dollar amount was comparable to the data by number of loans and was, therefore, excluded from the performance evaluation.

DESCRIPTION OF INSTITUTION

Ally is a wholly-owned subsidiary of Ally Financial, Inc. (AFI). AFI is a large automotive financial services company involved in consumer automobile lending, dealer automobile financing, loan servicing, vehicle remarketing, extended service contracts, and automobile dealer inventory insurance. AFI also has an extensive residential mortgage lending, warehouse lending, and mortgage loan servicing operation that is conducted through the GMAC Mortgage Group, LLC, subsidiary. Ally's second tier parent is IB Finance Holding Co., LLC a one-bank holding company who is 100 percent owned by AFI. Ally has four subsidiary organizations; Ally Wholesale Mortgage Corp., Ally Auto Assets, LLC, Ally Wholesale Enterprises, LLC, and Ally Variable Asset Receivables. These subsidiaries, which are 100 percent owned by Ally, were formed for various administrative functions pertaining to securitizations and the holding of fixed assets.

Ally, is a Utah chartered Industrial Bank that began operations on August 1, 2004. The original business focus of the institution was the purchase of retail installment sale and lease contracts entered into between licensed vehicle dealers and final vehicle customers. In November 2006, that strategy expanded to include residential mortgage loans following a reorganization purchase and assumption transaction that resulted in Ally purchasing all of the assets and liabilities of GMAC Bank, FSB. This purchase and assumption transaction changed the bank's primary business from automobile financing (which is conducted in Midvale, Utah) to residential mortgage lending (conducted in the former GMAC Bank, FSB, offices in Fort Washington, Pennsylvania). Ally does not maintain any traditional banking offices that are open for the public to conduct transactions. All deposit accounts are opened via the Internet, other electronic means, or through the mail. A review of FDIC records, as well as Ally's Public CRA File, did not reveal any complaints relating to Ally's CRA performance. There are no impediments legal, or otherwise, which impacted Ally's ability to help meet the credit needs of the assessment area during the evaluation period. Ally was assigned a Satisfactory CRA rating using Large Bank procedures during the prior CRA Evaluation dated August 18, 2008.

During the current CRA evaluation period, Ally originated and purchased home mortgage loans through relationships with various affiliates and correspondent mortgage brokers. Specifically, during 2008 the bank purchased mortgage loans that were originated throughout the United States by its affiliate, GMAC Mortgage, LLC (GMAC Mortgage), and correspondent mortgage brokers. It should be noted that the substantial majority of Ally's home mortgage loans for 2008 were not originated directly by the bank. Rather, these loans were originated by GMAC Mortgage and third party mortgage brokers that sold the loans to Ally shortly after consummation. Although these home mortgage loans were not originated directly by Ally, the bank reviewed the loan application packages prior to loan closing. According to HMDA requirements, Ally was considered the loan originator and was therefore responsible for the reporting of the loans on the bank's HMDA loan application register. Beginning in 2009, GMAC Mortgage ceased originating home mortgage loans and began acting solely as a mortgage broker for Ally. As referenced above, Ally maintained relationships with numerous loan brokers throughout the United States. As a result, Ally's HMDA lending data reflects the origination and purchase of a significant volume of residential mortgage loans on a national basis. In fact, according to 2009 HMDA data, Ally was the 8th largest residential mortgage lender in the United States.

Table A provides a breakdown of Ally's loan portfolio as of June 30, 2010. As illustrated, one to four family residential loans comprise the largest segment (35.2 percent) of Ally's loan portfolio, followed closely by commercial and industrial loans (28.4 percent). These commercial and industrial loans primarily represent large dollar loans pertaining to automobile dealer financing.

Table A - Loan Distribution as of June 30, 2010		
Loan Type	**Dollar Amount (000s)**	**Percent of Total Loans (%)**
Construction and Land Development	0	0.0
Secured by Farmland	0	0.0
1-4 Family Residential	14,586,063	35.2
Multi-Family (5 or more) Residential	0	0.0
Commercial Real Estate	1,795,199	4.4
Total Real Estate Loans	**16,381,262**	**39.6**
Commercial and Industrial	11,749,697	28.4
Agricultural	0	0.0
Consumer	11,478,243	27.7
Other	1,788,208	4.3
Lease Financing	0	0.0
Less: Unearned Income	0	0.0
Total Loans	**41,397,410**	**100.0**

Source: June 30, 2010 Report of Condition

As of the June 30, 2010, Consolidated Report of Condition and Income (CALL Report), Ally had total assets of $61.7 billion, total loans of $36.8 billion, total deposits of $31.9 billion (of which $29.1 billion are interest bearing deposits), and total equity capital of $8.3 billion. Ally also reported securities of $7.5 billion and cash and "due from" of $9.8 billion.

Ally had a Tier One Leverage Capital ratio of 13.3 percent and a Return on Average Assets (ROA) ratio of 0.70 percent as of June 30, 2010. Tier 1 leverage capital measures the level of the institution's core capital as a percent of total assets. ROA measures the institution's net income as a percent of average assets. Ally reported a $1.9 billion net loss for year-end 2009 and net income of $349.4 million as of June 30, 2010.

DESCRIPTION OF ASSESSMENT AREA

Ally's assessment area has been defined as 378 census tracts located in Salt Lake, Weber, Utah, Tooele, Davis, and Morgan Counties in the State of Utah. Davis, Morgan, and Weber Counties are located in Metropolitan Statistical Area (MSA) 36260. Salt Lake and Tooele Counties are located in MSA 41620, and Utah County is located MSA 39340. MSAs 36260 and 41620 are part of Combined Statistical Area (CSA) 482, while MSA 39340 is not part of any CSA. Due to the changes in Ally's operations and lending focus, the designated assessment area has been revised since the prior evaluation. While Ally does not maintain an office in MSA 39340, that MSA is contiguous to CSA 482 and shares similar characteristics. As a result, MSA 39340 has been included as part of the larger overall assessment area for the purposes of this evaluation. The bank's performance in Metropolitan Statistical Area 39340 was comparable to the bank's overall performance. As such, no separate description of that performance has been included within this evaluation. Table B contains selected demographic and housing information for the assessment area.

Table B – Selected Demographic and Housing Characteristics of the Assessment Area

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	378	4.2	19.6	48.7	26.7	0.8
Population by Geography	1,750,314	2.9	19.9	51.1	26.1	Nominal
Households by Geography	547,011	2.5	22.9	51.2	23.3	0.0
Housing Units by Geography	575,841	2.6	23.4	50.8	23.2	0.0
Owner-Occupied Housing by Geography	386,660	0.6	15.1	55.1	29.2	0.0
Family Distribution by Income Level	418,991	16.8	20.1	25.1	38.0	0.0
Distribution of Low and Moderate Income Families throughout AA Geographies	154,525	4.5	31.1	51.2	13.2	0.0
Median Family Income HUD Adjusted Median Family Income for 2009 Households Below Poverty Level		$53,449 $66,862 8.0%	Median Housing Value Unemployment Rate (2000 US Census)			$162,181 4.0%

(*) The NA category consists of geographies that have not been assigned an income classification. Sources: 2000 US Census and 2009 HUD updated Median Family Income.

The assessment area consists of 16 (4.2 percent) low-income census tracts, 74 (19.6 percent) moderate-income census tracts, 184 (48.7 percent) middle-income census tracts, and 101 (26.7 percent) upper-income census tracts. There are 3 (0.8 percent) census tracts for which limited demographic data is available, usually the result of limited or no population.

Population Data

According to the 2000 census, the population of Ally's assessment area is 1,750,314. Of this population, 51,167 (2.9 percent) reside in low-income census tracts, 348,591 (19.9 percent) reside in moderate-income census tracts, 894,188 (51.1 percent) reside in middle-income census tracts, 455,799 (26.1 percent) reside in upper-income census tracts, and 569 people reside in census tracts for which demographic data is not available.

The U.S. Bureau of Census defines a household as all persons occupying a housing unit. Income figures are based on the incomes of all contributing members of a household. Within Ally's assessment area there are 547,011 households. Of these households, 14,016 (2.6 percent) are low-income, 125,433 (22.9 percent) are moderate-income, 280,243 (51.2 percent) are middle-income, and 127,319 (23.3 percent) are upper-income.

The area is comprised of 418,991 family households (household where one or more occupants are related by birth, marriage, or adoption), of which 16.8 percent are low-income, 20.1 percent are moderate-income, 25.1 percent are middle-income, and 38.0 percent are upper-income. Approximately 8 percent of these families are identified as living below the federal poverty levels.

Housing Data

The total number of housing units within Ally's assessment area is 575,841, of which 67 percent are owner occupied and 28 percent are occupied rental units. The vacancy rate of the housing units is 5 percent. As of the 2000 census, the median housing value for the assessment area is $162,181, while median gross rent is $625. Less than one percent of the owner occupied housing units are located in low-income census tracts within the assessment area, while approximately fifteen percent of the units are located in moderate-income census tracts.

An analysis of the affordability of housing was performed during this evaluation. The affordability ratio is a method used to determine the amount of single family owner-occupied housing that a dollar of income can purchase, for the median household, within a given geography. The ratio is calculated by dividing the median household income by the median housing value of the area or geography under analysis. Values closer to 1.0 indicate greater affordability. The affordability ratio for Ally's assessment area is 0.24 (weighted), based on estimates of the area's median household income and median housing value for 2008. This ratio is weighted to compensate for median income and housing figures that encompass only portions of counties and MSAs. The affordability ratio for the State of Utah is 0.25. Additional information relative to housing data can be obtained at the U.S Census Bureau's web site – www.census.gov.

Competition and Services

Ally faces stiff competitive pressures within the designated assessment area and on a national basis. As mentioned previously, Ally is one of the largest residential mortgage lenders in the country. As such, Ally is in direct competition with such lenders as Bank of America, Citimortgage Inc., Wells Fargo Bank N.A., and JP Morgan Chase Bank. In addition, Ally's location in the State of Utah offers unique community development challenges. For example, over 30 Industrial Banks are headquartered in the state. As a result, there is a concentration of wholesale and limited purpose institutions that focus primarily on community development activities to meet CRA requirements. This has created strong competition for even the most routine community development opportunities. Furthermore, although the counties in the assessment area are part of an MSA, they are generally smaller markets than the comparatively larger MSA's throughout the nation. As such, CRA projects initiated within the state are generally fewer and may impact a smaller area. This results in a further increase in competitive pressures faced by banks that have included these counties in their designated assessment area.

Community Contacts

Information obtained during several community contacts was reviewed in connection with the current CRA evaluation. These contacts indicated that the economic downturn is having an effect on the area and layoffs and foreclosures are on the rise. The contacts identified a strong ongoing need for affordable housing, particularly for the homeless, refugees, low-income families, and senior citizens. This includes both multi-family housing and single-family residences. Contacts stressed the need for expanding access to capital, especially for pre-development funding, land-banking resources, and making construction and permanent financing available at favorable rates. Other identified needs include home mortgage workout programs, small dollar loans to small and start-up businesses, the provision of grants and donations to community service and affordable housing organizations, and financial education training (counseling for first-time homebuyers, foreclosure prevention training, and training for owners of small and start-up businesses).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Scope of Test

The lending test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) by considering an institution's home mortgage, small business, small farm, and community development lending. The institution's lending performance is evaluated pursuant to the following criteria: 1) the volume of lending activity; 2) the proportion of lending within the assessment area; 3) the dispersion of loans and the number and amount of loans in low-, moderate-, middle- and upper-income geographies in the assessment area; 4) the distribution of loans among borrowers of low-, moderate-, middle- and upper-income levels and businesses (including farms) of different sizes; 5) the distribution of small business and small farm loans by loan amount at origination; 6) the volume of community development lending; and (7) the use of innovative or flexible lending practices. Performance under the lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

Lending Activity and Assessment Area Concentration

This performance criterion considers the volume of Ally's lending, including the number and dollar amount of Ally's home mortgage (HMDA) loans that were originated within the bank's assessment area during 2008 and 2009.

Conclusion:

Overall, Ally's lending activity reflects adequate responsiveness to assessment area credit needs. As reflected in Table C, a small percentage of Ally's HMDA lending was located in the designated assessment area. This small percentage of lending is a function of Ally's national lending scope without a traditional branch office network. The small percentage of lending does not meet the technical requirements of satisfactory CRA performance. However, minimal weight was placed on this criterion in recognition of the fact that despite a low percentage of loans, the actual number of loans originated and purchased by Ally in the assessment area was significant.

<u>Lending Activity</u>

As of June 30, 2010, Ally's net loan-to-deposit (NLTD) ratio was 127.4 percent. Ally's NLTD ratio was consistently high during the evaluation period, as reflected in the 116.9 percent average NLTD during the 8 quarters since the previous CRA evaluation.

During 2009, Ally was ranked number 11 out of 399 lenders that reported originating or purchasing at least one HMDA loan in the bank's designated assessment area during that year. Ally achieved a market share total of 2.3 percent by number and 2.5 percent by dollar volume of all originated and purchased HMDA loans in the assessment area. Ally's market rank and share indicate that Ally was responsive to assessment area credit needs. In addition, Ally was one of the largest originator and purchaser of HMDA loans in the United States during the evaluation period. This is evidenced by the fact that Ally was the 8th ranked HMDA lender in the United States during 2009.

Assessment Area Concentration

Table C depicts the number and dollar volume distribution of Ally's Home Mortgage (HMDA) and small business lending inside and outside of the assessment area during 2008 and 2009:

Table C - Distribution of Loans Inside and Outside of the Assessment Area

Loan Category or Type	Number of Loans					Dollars in Loans (000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		$	%	$	%	
Home Mortgage										
2008	2,338	1.4	169,409	98.6	171,747	510,432	1.4	35,373,618	98.6	35,884,050
2009	3,900	1.4	275,924	98.6	279,824	826,656	1.4	58,801,225	98.6	59,627,881
SubTotal	6,238	1.4	445,333	98.6	451,571	1,337,088	1.4	94,174,843	98.6	95,511,931
Small Business										
2008	0	0	90	100	90	0	0	45,400	100	45,400
2009	95	0.7	14,219	99.3	14,314	3,164	0.5	611,313	99.5	614,477
SubTotal	95	0.7	14,309	99.3	14,404	3,164	0.5	656,713	99.5	659,877
Total	**6,333**	**1.4**	**459,642**	**98.6**	**465,975**	**1,340,252**	**1.4**	**94,831,556**	**98.6**	**96,171,808**

Source: HMDA Disclosure Statements (2008 & 2009), CRA LAR (2008 & 2009)

As reflected in Table C, only 1.4 percent of Ally's overall number and dollar volume of loans was originated and purchased inside of the designated assessment area during the evaluation period. The majority (98.6 percent of the number and dollar volume) of the loans was originated outside the assessment area. The low percentage of lending inside Ally's assessment area is not unexpected in light of the bank's national lending operations. While Ally's assessment area concentration is less than satisfactory according to the technical requirements of CRA, the large number and dollar volume of lending, as reflected in the bank's high market rank in terms of HMDA lending, was significant and responsive to assessment area credit needs. As such, a further analysis of Ally's geographic distribution and borrower profile for HMDA lending is warranted.

Table D further delineates the types of residential mortgage loans originated and purchased by Ally inside the assessment area during this evaluation period.

Table D – Types of HMDA Loans Inside the Assessment Area						
Loan Category or Type	**2008**		**2009**		**Total**	
	#	**%**	**#**	**%**	**#**	**%**
Home Purchase	834	35.7	912	23.3	1,746	28.0
Refinance	1,500	64.1	2,953	75.7	4,453	71.4
Home Improvement	4	0.2	35	1.0	39	0.6
Total	**2,338**	**100**	**3,900**	**100**	**6,238**	**100**

Source: HMDA Disclosure Statements (2008 and 2009).

As reflected in Table C, the bank did not originate any small business loans in the assessment area during 2008. This is not surprising, given the bank's minimal volume of small business lending for that year. However, during 2009 an organizational change caused the bank's volume of small business lending to increase significantly. These loans, which were made by automobile dealers located throughout the country and subsequently purchased by Ally, were for commercial purpose vehicles. While there were 95 small business loans originated in the assessment area during 2009, no meaningful conclusions could be drawn regarding the bank's performance. As such, no further analysis of these loans was conducted.

Geographic Distribution of Loans

This segment of the performance evaluation assesses the bank's performance in addressing the credit needs in low-, moderate-, middle-, and upper-income census tracts in the bank's assessment area. Ally's HMDA performance was compared to that of the aggregate during 2009. For the purposes of this evaluation, the aggregate is defined as all other lenders that reported the origination of a HMDA loan within Ally's designated assessment area during that year.

Conclusion:

Overall, Ally's lending reflects adequate penetration throughout the assessment area. Table E depicts the distribution of Ally's HMDA loans based on census tract income levels.

Table E - Distribution of HMDA Loans by Income Category of the Census Tract								
Census Tract Income Level	**Owner-Occupied Housing Units***	**2009 Aggregate Lending Data ****	**2008 Bank Data*****		**2009 Bank Data*****		**Total Bank Data**	
	% of #	**% of #**	**#**	**%**	**#**	**%**	**#**	**%**
Low	0.6	0.6	14	0.6	23	0.6	37	0.6
Moderate	15.1	10.8	271	11.6	424	10.9	695	11.2
Middle	55.1	59.6	1,327	56.8	2,331	59.8	3,658	58.6
Upper	29.2	28.9	726	31.0	1,121	28.7	1,847	29.6
NA	0.0	0.0	0	0.0	1	Nominal	1	0.0
Total *	**100**	**100**	**2,338**	**100**	**3,900**	**100**	**6,238**	**100**

Sources: *U.S. Census, **2009 HMDA Aggregate Data, ***HMDA Disclosure Statements (2008 and 2009).

As reflected in Table E, Ally's percentage of lending in low-income census tracts was consistent between 2008 and 2009. Ally's volume of lending in low-income census tracts (0.6 percent) mirrors both the percentage of owner-occupied housing units that were located in these areas, and the aggregate lending data. It should be noted that according to 2000 U.S. census data, there were only approximately 2,300 owner-occupied housing units located in the low-income census tracts of the assessment area. As such, the opportunities for lenders to provide housing-related financing are limited, and the competition among lenders to meet the narrow demand is intense. This is reflected by the fact that 305 (76 percent) of the aggregate HMDA lenders operating in the assessment area (399) during 2009 were unable to originate or purchase a single loan in these census tracts. Ally was ranked number 10 out of 94 lenders in terms of the number of loans originated in low-income census tracts in the assessment area during 2009. Notably, this market rank is slightly higher than the number 11 overall market rank achieved by the bank for that year.

Ally's overall lending in moderate-income census tracts during the evaluation period was 11.2 percent. Ally's volume of lending in these areas was greater than that of the aggregate (10.8 percent) during 2009. Both Ally and aggregate lending percentages were less than the percentage that the owner-occupied housing units in moderate-income census tracts represented (15.1 percent). This is an important factor as it is likely an indicator of a limited opportunity to lend as a result of decreased demand for housing loans in these areas. Ally's 2009 market rank in terms of the number of loans originated in moderate-income census tracts was number 13 out of 241 lenders. Ally's percentage of lending in moderate-income census tracts decreased slightly from 11.6 percent in 2008 to 10.9 percent during 2009. However, this decrease was not significant, and Ally's lending in moderate-income census tracts during the evaluation period is considered reasonable.

The analysis of the bank's geographic distribution of loans revealed adequate penetration throughout the assessment area. However, given the bank's national lending focus, an additional analysis was conducted using the bank's performance in 33 separate Metropolitan Statistical Areas (MSAs) and Metropolitan Divisions (MDs). This analysis was conducted to determine if the bank's lending in these supplemental areas was consistent with the adequate penetration noted in the assessment area. The additional analysis included HMDA and small business lending data, and focused on the low- and moderate-income census tracts located in the MSAs and MDs. As reflected in Tables F and G, the bank's performance was generally consistent with comparative demographic and aggregate data. Specifically, there were very few supplemental areas where the bank's performance was significantly greater or less than the market. Overall, the review of the bank's lending in the supplemental areas determined that the bank was neither a leader nor a laggard in the market, and its lending in low- and moderate-income census tracts was consistent with satisfactory performance.

Table F – Geographic Distribution of 2009 HMDA Loans in Supplemental Areas						
MSA/MD	Low-income CTs (% MSA)	% of aggregate lending in low-income CTs (#)	% of Ally Bank lending in low-income CTs (#)	Moderate-income CTs (% MSA)	% of aggregate lending in moderate-income CTs (#)	% of Ally Bank lending in moderate-income CTs (#)
16974 (Chicago, IL)	13.6	2.3	**1.6**	24.8	10.1	**8.0**
31084 (Los Angeles, CA)	8.7	1.8	**1.6**	28.3	12.7	**12.6**
19740 (Denver, CO)	3.9	2.0	**2.1**	26.6	13.7	**13.6**
38060 (Phoenix, AZ)	6.2	0.6	**0.7**	28.6	15.8	**16.6**
42022 (Santa Ana, CA)	3.6	0.7	**0.9**	26.9	15.1	**15.1**
47894 (Washington, DC)	8.8	2.6	**2.7**	24.9	14.2	**15.6**
37964 (Philadelphia, PA)	12.3	3.2	**3.3**	19.5	12.7	**13.8**
40140 (Riverside, CA)	4.6	0.8	**0.8**	28.8	16.9	**17.4**
41740 (San Diego, CA)	7.9	2.4	**2.1**	22.5	10.3	**9.8**
14484 (Boston, MA)	10.1	2.4	**1.5**	24.0	11.8	**10.5**
36084 (Oakland, CA)	10.6	2.3	**2.2**	21.1	9.6	**11.0**
15764 (Cambridge, MA)	5.1	0.8	**0.8**	22.3	12.4	**11.1**
28140 (Kansas City, MO)	8.9	0.7	**0.5**	26.0	8.3	**7.1**
41180 (St. Louis, MO)	10.2	1.1	**1.3**	24.3	10.0	**11.7**
38900 (Portland, OR)	2.8	0.7	**1.1**	22.5	14.1	**14.9**
26420 (Houston, TX)	7.9	1.4	**1.5**	31.4	9.7	**10.8**
42644 (Seattle, WA)	2.2	0.6	**0.9**	20.8	13.9	**15.4**
12580 (Baltimore, MD)	12.6	2.4	**2.8**	21.9	12.0	**15.3**
41940 (San Jose, CA)	4.0	1.2	**1.3**	22.6	13.7	**16.3**
12060 (Atlanta, GA)	10.4	1.8	**1.5**	26.8	12.9	**14.4**
46060 (Tucson. AZ)	5.1	1.2	**1.6**	30.8	14.3	**15.5**
26900 (Indianapolis, IN)	8.3	0.8	**0.5**	27.6	7.3	**7.3**
20764 (Edison, NJ)	4.6	1.4	**1.7**	18.4	11.9	**11.3**
33340 (Milwaukee, WI)	19.0	1.9	**0.8**	20.0	7.3	**5.8**
40900 (Sacramento, CA)	7.2	2.4	**2.5**	24.6	11.8	**13.3**
35644 (New York, NY)	11.6	2.2	**1.8**	24.6	11.4	**10.4**
19124 (Dallas, TX)	9.1	0.8	**0.6**	29.6	7.4	**8.7**
33460 (Minneapolis, MN)	6.3	1.2	**1.8**	19.7	9.8	**11.2**
15804 (Camden, NJ)	6.0	0.9	**0.4**	15.4	6.9	**6.8**
41884 (San Francisco, CA)	7.3	2.8	**2.3**	21.5	11.4	**11.1**
35084 (Newark, NJ)	15.9	3.4	**4.2**	24.0	12.5	**14.0**
16740 (Charlotte, NC)	6.0	0.6	**0.7**	27.3	8.7	**8.0**
19804 (Detroit, MI)	11.5	0.9	**1.1**	30.7	7.4	**4.1**

Sources: U.S. Census, 2009 HMDA Aggregate Data, and 2009 HMDA Disclosure Statement.

Table G – Geographic Distribution of 2009 Small Business Loans in Supplemental Areas

MSA	% businesses in Low-income CTs	% of aggregate lending in low-income CTs (#)	% of Ally Bank lending in low-income CTs (#)	% businesses in Moderate-income CTs	% of aggregate lending in moderate-income CTs (#)	% of Ally Bank lending in moderate-income CTs (#)
16974 (Chicago, IL)	3.9	2.2	**0.4**	14.3	11.1	**9.8**
31084 (Los Angeles, CA)	7.6	5.3	**6.2**	20.5	16.4	**20.1**
19740 (Denver, CO)	3.7	3.1	**6.3**	22.6	20.8	**28.6**
38060 (Phoenix, AZ)	4.5	3.3	**9.0**	22.7	18.9	**24.2**
42022 (Santa Ana, CA)	2.9	2.3	**5.0**	28.3	23.8	**23.0**
47894 (Washington, DC)	4.7	3.3	**2.8**	16.9	13.7	**13.8**
37964 (Philadelphia, PA)	8.4	4.0	**4.0**	16.2	11.3	**9.6**
40140 (Riverside, CA)	3.5	2.2	**2.0**	27.6	22.6	**18.8**
41740 (San Diego, CA)	4.9	3.3	**2.2**	20.7	16.4	**20.0**
14484 (Boston, MA)	10.1	6.2	**1.1**	15.4	13.4	**9.6**
36084 (Oakland, CA)	10.2	6.9	**10.0**	16.2	12.8	**20.0**
15764 (Cambridge, MA)	3.2	2.2	**1.3**	17.4	14.9	**14.3**
28140 (Kansas City, MO)	3.7	2.6	**3.6**	18.7	16.0	**8.4**
41180 (St. Louis, MO)	4.7	3.5	**0.6**	18.2	14.5	**12.2**
38900 (Portland, OR)	4.1	3.6	**0.0**	20.9	18.1	**15.8**
26420 (Houston, TX)	4.8	3.9	**2.1**	24.3	22.5	**22.7**
42644 (Seattle, WA)	2.5	2.4	**0.0**	23.8	20.1	**20.3**
12580 (Baltimore, MD)	5.3	3.5	**2.3**	15.9	10.9	**6.8**
41940 (San Jose, CA)	2.9	2.5	**0.0**	23.7	18.7	**25.0**
12060 (Atlanta, GA)	4.5	2.9	**2.5**	19.1	16.1	**21.8**
46060 (Tucson. AZ)	3.8	2.6	**6.9**	28.7	26.1	**41.4**
26900 (Indianapolis, IN)	3.4	2.3	**6.3**	16.4	12.7	**15.6**
20764 (Edison, NJ)	3.2	2.1	**2.4**	13.3	11.5	**12.5**
33340 (Milwaukee, WI)	8.2	4.9	**2.8**	13.5	10.2	**7.0**
40900 (Sacramento, CA)	7.1	5.0	**2.4**	21.6	17.2	**14.6**
35644 (New York, NY)	6.7	4.7	**5.1**	17.9	14.5	**10.9**
19124 (Dallas, TX)	4.4	3.7	**2.7**	15.1	21.6	**25.5**
33460 (Minneapolis, MN)	3.9	2.8	**2.5**	15.4	12.1	**12.4**
15804 (Camden, NJ)	3.8	2.0	**2.4**	10.3	8.6	**3.6**
41884 (San Francisco, CA)	15.1	11.0	**0.0**	18.1	16.7	**16.7**
35084 (Newark, NJ)	9.2	5.3	**4.4**	17.5	12.8	**8.2**
16740 (Charlotte, NC)	3.3	2.6	**5.7**	18.2	16.8	**18.2**
19804 (Detroit, MI)	6.5	4.3	**10.4**	24.1	17.3	**10.4**

Sources: Dun & Bradstreet, 2009 CRA Disclosure, and 2009 CRA Aggregate Data

Borrower Characteristics

This performance criterion considers the distribution, particularly in the bank's assessment area, of the bank's HMDA loans based on borrower characteristics, including the number of loans to low-, moderate-, middle-, and upper-income borrowers.

Borrower incomes are compared to Department of Housing and Urban Development ("HUD") adjusted median family income figures for the year in which the loans were granted. Table H contains the 2008 and 2009 HUD Adjusted Incomes for those MSAs that comprise Ally's assessment area. These figures can also be obtained at HUD's web site–www.huduser.org.

Table H – HUD Adjusted Income by MSA

MSA	Name	2008	2009
36260	Ogden-Clearfield	$65,000	$68,500
39340	Provo-Orem	$60,000	$62,900
41620	Salt Lake	$65,300	$67,800

Source: US Department of Housing and Urban Development

This category discusses the bank's HMDA lending for 2008 and 2009 and compares it to the percentage of total families within each income category and the aggregate lending data of all other institutions within the bank's assessment area. Borrower incomes were compared to the adjusted median family income figures reflected in Tables I-1, I-2, and I-3.

Table I-1 -HUD Adjusted Income Levels (MSA 36260)

Income Level	Percent of Income	Income Range 2008	Income Range 2009
Low	< 50%	Less than $32,500	Less than $34,250
Moderate	= 50%, but less than 80%	$32,500 to less than $52,000	$34,250 to less than $54,800
Middle	= 80%, but less than 120%	$52,000 to less than $78,000	$54,800 to less than $82,200
Upper	= or > 120%	Equal to or Greater than $78,000	Equal to or Greater than $82,200

Source: US Department of Housing and Urban Development

Table I-2 -HUD Adjusted Income Levels (MSA 39340)

Income Level	Percent of Income	Income Range 2008	Income Range 2009
Low	< 50%	Less than $30,000	Less than $31,450
Moderate	= 50%, but less than 80%	$30,000 to less than $48,000	$31,420 to less than $50,320
Middle	= 80%, but less than 120%	$48,000 to less than $72,000	$50,320 to less than $75,480
Upper	= or > 120%	Equal to or Greater than $72,000	Equal to or Greater than $75,480

Source: US Department of Housing and Urban Development

Table I-3 -HUD Adjusted Income Levels (MSA 41620)			
Income Level	**Percent of Income**	**Income Range 2008**	**Income Range 2009**
Low	< 50%	Less than $32,650	Less than $33,900
Moderate	= 50%, but less than 80%	$32,650 to less than $52,240	$33,900 to less than $54,240
Middle	= 80%, but less than 120%	$52,240 to less than $78,360	$54,240 to less than $81,360
Upper	= or > 120%	Equal to or Greater than $78,360	Equal to or Greater than $81,360

Source: US Department of Housing and Urban Development

Conclusion:

Ally's lending reflects an adequate distribution of loans to borrowers of different income levels.

Table J depicts the distribution of Ally's HMDA loans based on borrower income classifications. This table includes the HMDA loans that were originated and purchased by Ally in the assessment area.

Table K also depicts the distribution of Ally's HMDA loans based on borrower income classifications. However, this table only includes the loans that were originated by Ally and does not include purchased loans. During the evaluation period, the bank purchased 4,281 of the 6,238 HMDA loans located in the designated assessment area. As reflected in Table J, 61.3 percent of Ally's loans in 2008 reported "NA" as the income of the borrower. Further, this relatively high percentage of "NA" loans increased to 79.3 percent in 2009. The high percentage of "NA" loans is a function of the large number of HMDA loans that are purchased by the bank. HMDA does not require institutions to report income data for purchased loans, and as a result the majority of Ally's loans did not have income to analyze. As reflected in Table J, the bank's percentage of "NA" loans is significantly higher than that of the aggregate (22.9 percent versus 79.3 percent). Since a high percentage of Ally's loans did not have income reported, a separate analysis of only originated loans was conducted. These loans are much more likely to have income reported and therefore provide a more complete picture of the distribution of Ally's loans by borrower income.

Table J - Distribution of HMDA Loans by Borrower Income (Originated and Purchased)								
Borrower Income Level	**% of Total Families***	**2009 Aggregate Lending Data****	**2008 Bank Data*****		**2009 Bank Data*****		**Total Bank Data**	
	% of #	**% of #**	**#**	**%**	**#**	**%**	**#**	**%**
Low	16.8	5.8	34	1.5	45	1.2	79	1.3
Moderate	20.1	20.3	209	8.9	201	5.1	410	6.6
Middle	25.1	23.8	291	12.4	275	7.0	566	9.1
Upper	38.0	27.2	371	15.9	287	7.4	658	10.5
NA	0.0	22.9	1,433	61.3	3,092	79.3	4,525	72.5
Total	**100**	**100**	**2,338**	**100**	**3,900**	**100**	**6,238**	**100**

Sources: *U.S. Census, **2009 HMDA Aggregate Data, ***HMDA Disclosure Statements (2008 and 2009).

As reflected in Table J, Ally's percentage of lending to low-income borrowers (1.2 percent) was less than that of the aggregate (5.8 percent) during 2009. This 1.2 percent also represented a decrease from the 1.5 percent in 2008. Both Ally's and aggregate lending performance was less than the percentage of low-income families in the assessment area (16.8 percent) during 2009. This is not unexpected based on the high cost of housing in the assessment area. For example, the median housing value of the assessment area was $162,181 as of the 2000 U.S. census. As indicated in Tables I-1 through I-3, potential low-income borrowers generally earned less than $34,000 annually, which would preclude most from being able to qualify for a home loan. This is also consistent with the comments made by various community contacts who stated that there is a need for additional affordable housing in Ally's assessment area.

Ally's percentage of lending to moderate-income borrowers (5.1 percent) was less than that of the aggregate (20.3 percent) in 2009, and also represented a decrease from 2008. While there is a large disparity between the bank's 2009 percentage of lending to moderate-income borrowers compared to the aggregate, it should be noted that similar disparities are noted in the percentage of lending to middle- (7.0 percent vs. 23.8 percent) and upper-income (7.4 percent vs. 27.2 percent) borrowers. Again, this is a function of the large number of loans purchased by the bank where borrower income was not reported as part of the bank's HMDA data.

Ally was ranked number 39 out of 178 lenders that originated or purchased a loan obtained by a low-income borrower in 2009. Ally's rank was somewhat higher for lending to moderate-income borrowers in that the market rank was number 32 out of 246 lenders. While these percentages are lower than the overall market rank achieved by Ally (number 11), Ally's volume of lending to borrowers in these income categories is considered adequate in light of the fact that almost 35 percent of the HMDA aggregate lenders failed to originate a single loan to a low- or moderate-income borrower in the assessment area during 2009.

Although Ally's lending performance to low- and moderate-income borrowers was generally less than the aggregate and demographic comparative factors discussed above, the percentage of lending in these income categories was impacted by the large number of loans that were purchased by the bank. Table K depicts the distribution of Ally's originated HMDA loans based on borrower income classifications. This table only includes the loans that were originated by Ally and does not include purchased loans. Similarly, the aggregate lending data presented in Table K does not include purchased loans.

Table K - Distribution of HMDA Loans by Borrower Income (Originated Loans Only)

Borrower Income Level	% of Total Families *	2009 Aggregate Lending Data**	2008 Bank Data***		2009 Bank Data***		Total Bank Data	
	% of #	% of #	#	%	#	%	#	%
Low	16.8	6.6	34	3.6	45	4.4	79	4.0
Moderate	20.1	22.4	209	22.2	201	19.8	410	21.0
Middle	25.1	26.7	291	30.9	275	27.1	566	28.9
Upper	38.0	32.1	371	39.4	287	28.3	658	33.6
NA	0.0	12.2	37	3.9	207	20.4	244	12.5
Total	**100**	**100**	**942**	**100**	**1,015**	**100**	**1,957**	**100**

Sources: *U.S. Census, **2009 HMDA Aggregate Data, ***HMDA Disclosure Statements (2008 and 2009).

As reflected in Table K, the percentage of loans originated by Ally to low-income borrowers (4.4 percent) was less than that of the aggregate in 2009 (6.6 percent). Similarly, Ally's percentage of originated loans to moderate-income borrowers (19.8 percent) was also less than that of the aggregate (22.4 percent) in 2009. Ally's percentage of lending was also less than the percentage of moderate-income families in the assessment area (20.1 percent). Overall, Ally's record of lending to low- and moderate-income borrowers in the assessment area is adequate. Ally has originated a relatively high number of loans (489) to borrowers in these income categories despite significant barriers to home ownership.

As with the geographic distribution of loans, the bank's lending performance in the 33 supplemental MSAs and MDs was reviewed to gauge the level of lending to low- and moderate-income borrowers. Since all of the bank's small business loans were purchased, there was no revenue data available for comparison purposes. As reflected in Table L, the bank's percentage of lending to low- and moderate-income borrowers was well below demographic and aggregate data. However, this is once again a function of the high volume of bank loans that did not report applicant income, and is not considered an indicator that the bank focused on middle- and upper-income borrowers to the detriment of low- and moderate-income borrowers. This conclusion is further supported by the data in Table M, which shows the bank originated a higher percentage of loans to low- and moderate-income borrowers than aggregate lenders in the majority of the supplemental areas. Overall, the review of the bank's lending in the supplemental areas determined that the bank was generally consistent with the market, and its lending to low- and moderate-borrowers was consistent with satisfactory performance.

Table L - Distribution of 2009 HMDA Loans by Borrower Income in Supplemental Areas-Originated and Purchased						
MSA	Low-income families (% of MSA)	% of aggregate lending to low-income (#)	% of Ally Bank lending to low-income (#)	Moderate-income families (% of MSA)	% of aggregate lending to moderate-income (#)	% of Ally Bank lending to moderate-income (#)
16974 (Chicago, IL)	20.9	5.2	**2.0**	17.6	15.2	**7.4**
31084 (Los Angeles, CA)	23.9	2.8	**1.7**	16.5	8.4	**4.4**
19740 (Denver, CO)	18.0	7.0	**2.2**	18.7	17.3	**7.2**
38060 (Phoenix, AZ)	19.6	7.8	**2.0**	18.8	18.0	**4.5**
42022 (Santa Ana, CA)	20.7	4.7	**2.6**	20.7	13.2	**6.5**
47894 (Washington, DC)	20.2	8.1	**3.2**	17.8	17.5	**5.9**
37964 (Philadelphia, PA)	22.2	6.9	**2.8**	20.5	17.6	**8.7**
40140 (Riverside, CA)	21.7	6.8	**1.3**	17.5	16.1	**3.9**
41740 (San Diego, CA)	21.0	3.5	**1.9**	17.9	11.6	**5.3**
14484 (Boston, MA)	21.7	4.0	**1.3**	17.1	15.5	**7.0**
36084 (Oakland, CA)	21.0	5.4	**1.7**	17.5	13.4	**4.6**
15764 (Cambridge, MA)	19.3	5.6	**2.8**	18.3	16.4	**7.2**
28140 (Kansas City, MO)	18.6	7.8	**1.5**	19.0	17.5	**3.5**
41180 (St. Louis, MO)	19.5	7.4	**1.0**	18.5	17.7	**3.2**
38900 (Portland, OR)	18.4	4.5	**1.0**	19.2	17.8	**3.2**
26420 (Houston, TX)	22.6	3.8	**0.6**	17.4	14.8	**2.7**
42644 (Seattle, WA)	18.5	5.4	**1.7**	18.7	17.6	**4.2**
12580 (Baltimore, MD)	20.5	7.1	**2.0**	17.8	17.8	**4.6**
41940 (San Jose, CA)	20.5	4.4	**2.1**	18.1	11.9	**4.5**
12060 (Atlanta, GA)	20.0	9.3	**2.6**	18.1	19.0	**4.7**
46060 (Tucson. AZ)	20.1	6.3	**0.6**	18.5	13.9	**2.2**
26900 (Indianapolis, IN)	19.3	9.3	**3.7**	18.6	18.2	**9.3**
20764 (Edison, NJ)	19.1	6.0	**3.3**	18.6	17.8	**9.7**
33340 (Milwaukee, WI)	19.8	5.7	**1.9**	17.9	17.2	**6.6**
40900 (Sacramento, CA)	20.6	6.7	**2.2**	18.3	16.2	**4.1**
35644 (New York, NY)	25.8	1.1	**0.6**	15.4	5.9	**2.9**
19124 (Dallas, TX)	21.3	4.8	**0.7**	18.0	13.6	**2.4**
33460 (Minneapolis, MN)	17.1	11.1	**3.2**	19.0	23.0	**6.9**
15804 (Camden, NJ)	18.9	7.2	**2.3**	18.5	21.3	**7.4**
41884 (San Francisco, CA)	21.3	3.4	**2.0**	20.0	11.0	**4.7**
35084 (Newark, NJ)	22.2	3.4	**2.3**	16.7	13.7	**6.9**
16740 (Charlotte, NC)	19.4	7.7	**2.5**	18.5	18.0	**5.9**
19804 (Detroit, MI)	23.1	7.5	**0.4**	16.6	17.2	**5.0**

Sources: U.S. Census, 2009 HMDA Aggregate Data, and 2009 HMDA Disclosure Statement

Table M - Distribution of 2009 HMDA Loans by Borrower Income in Supplemental Areas-Originated						
MSA	Low-income families (% of MSA)	% of aggregate lending to low-income (#)	% of Ally Bank lending to low-income (#)	Moderate-income families (% of MSA)	% of aggregate lending to moderate-income (#)	% of Ally Bank lending to moderate-income (#)
16974 (Chicago, IL)	20.9	5.7	**3.8**	17.6	15.7	**14.0**
31084 (Los Angeles, CA)	23.9	3.2	**4.1**	16.5	9.0	**11.0**
19740 (Denver, CO)	18.0	7.9	**4.9**	18.7	18.8	**15.7**
38060 (Phoenix, AZ)	19.6	9.1	**8.0**	18.8	20.0	**18.1**
42022 (Santa Ana, CA)	20.7	5.1	**6.9**	20.7	14.1	**17.8**
47894 (Washington, DC)	20.2	8.5	**12.7**	17.8	18.2	**23.5**
37964 (Philadelphia, PA)	22.2	7.3	**7.0**	20.5	18.2	**21.6**
40140 (Riverside, CA)	21.7	8.1	**5.4**	17.5	18.0	**15.6**
41740 (San Diego, CA)	21.0	4.1	**5.3**	17.9	12.8	**14.7**
14484 (Boston, MA)	21.7	4.8	**3.5**	17.1	18.0	**18.7**
36084 (Oakland, CA)	21.0	5.8	**7.0**	17.5	14.4	**19.0**
15764 (Cambridge, MA)	19.3	6.6	**7.9**	18.3	18.4	**20.3**
28140 (Kansas City, MO)	18.6	8.9	**9.0**	19.0	19.3	**20.8**
41180 (St. Louis, MO)	19.5	8.1	**6.3**	18.5	19.2	**19.4**
38900 (Portland, OR)	18.4	5.1	**7.4**	19.2	18.6	**22.7**
26420 (Houston, TX)	22.6	3.8	**3.3**	17.4	14.2	**13.9**
42644 (Seattle, WA)	18.5	5.8	**9.4**	18.7	18.3	**22.3**
12580 (Baltimore, MD)	20.5	7.4	**10.4**	17.8	18.4	**22.9**
41940 (San Jose, CA)	20.5	4.6	**9.1**	18.1	12.8	**19.9**
12060 (Atlanta, GA)	20.0	9.9	**11.6**	18.1	18.9	**20.9**
46060 (Tucson. AZ)	20.1	8.5	**4.2**	18.5	16.0	**15.6**
26900 (Indianapolis, IN)	19.3	9.9	**7.8**	18.6	19.2	**20.0**
20764 (Edison, NJ)	19.1	6.4	**7.1**	18.6	18.3	**21.1**
33340 (Milwaukee, WI)	19.8	6.1	**5.0**	17.9	17.8	**17.1**
40900 (Sacramento, CA)	20.6	7.4	**8.1**	18.3	17.2	**15.2**
35644 (New York, NY)	25.8	1.1	**1.6**	15.4	5.5	**8.2**
19124 (Dallas, TX)	21.3	4.9	**3.7**	18.0	13.7	**13.5**
33460 (Minneapolis, MN)	17.1	11.9	**11.7**	19.0	23.6	**25.3**
15804 (Camden, NJ)	18.9	7.9	**7.2**	18.5	22.1	**23.2**
41884 (San Francisco, CA)	21.3	3.5	**7.1**	20.0	11.8	**16.7**
35084 (Newark, NJ)	22.2	3.7	**6.0**	16.7	14.0	**18.3**
16740 (Charlotte, NC)	19.4	8.2	**7.5**	18.5	18.4	**17.6**
19804 (Detroit, MI)	23.1	9.1	**1.5**	16.6	18.8	**19.2**

Sources: U.S. Census, 2009 HMDA Aggregate Data, and 2009 HMDA Disclosure Statement

Community Development Lending

The institution's community development lending activities are evaluated pursuant to the following criteria: 1) the extent to which community development lending opportunities have been made available to the institution; 2) the responsiveness of the institution's community development lending; and 3) the extent of leadership the institution has demonstrated in community development lending.

Conclusion:

During the evaluation period, Ally originated an adequate level of community development loans within the designated assessment area. Ally originated and provided in-cycle disbursements for 14 qualified community development loans totaling $31 million within the designated assessment area and the greater regional/statewide area. The level of community development lending represented 0.05 percent of total assets and 0.1 percent of net loans as of June 30, 2010. This is adequate considering the level of competition present in the state. As mentioned previously, Ally's assessment area coincides with several other large financial institutions that concentrate their CRA efforts on community development activities. As a result, there is significant competition for a limited number of community development loans and other lending activities in the assessment area. Table N details Ally's community development loans by activity year and the primary community development purpose of the loans.

Table N - Community Development Loans by Activity Year and Community Development Purpose

Primary Community Development Purpose	2008		2009		2010		Total	
	#	$(000s)	#	$ (000s)	#	$(000s)	#	$(000s)
Affordable Housing	2	1,196	8	22,704	2	1,002	12	24,902
Activities that promote economic development	0	0	1	5,063	1	1,000	2	6,063
Totals	**2**	**1,196**	**9**	**27,767**	**3**	**2,002**	**14**	**30,965**

Source: Bank Records

Ally made disbursements totaling $3 million during the current review period on four community development loans made in the prior review period. In 2009 and year-to-date 2010, a total of 10 community development loans totaling $28 million were originated. These loans primarily help to meet the economic development needs of the assessment area and the affordable housing needs of low- and moderate-income individuals. Some of the loans also helped to revitalize and stabilize low- and moderate-income areas. The following provides descriptions of the most notable community development loans:

- Ally granted $20 million in loan funds to a neighborhood housing organization that offers a number of programs targeted toward low- and moderate-income individuals and geographies, including:
  - ► A homeownership education and counseling program that supports long-term homeownership for low-income families by promoting training standards and quality service delivery. This program focuses on providing continuing education and certification for homeownership practitioners, along with delivering professional tools and resources.
  - ► An affordable housing training program that is dedicated to providing the highest quality training to the staff and boards of organizations committed to improving the affordability of neighborhood housing, the vitality of neighborhood economies, and the quality of community life.
  - ► A foreclosure prevention program that was created to preserve homeownership in the face of rising foreclosure rates. This program reaches thousands of homeownership professionals through the affordable housing training program and place-based training events. Scholarship opportunities exist for homeownership practitioners to obtain foreclosure training.
  - ► A financial education program that works with national partners to help educate individuals and families to develop sound money management skills.
  - ► A sustainable community training program that focuses on advancing environmental responsibility across the community development industry, in the operations of organizations, for the homes that are built and managed, and for the communities its serves.
  - ► A community development research program that helps to design, structure, implement, and document the research and innovation efforts of the organization's initiatives to assist low- and moderate-income individuals and families.

- Ally granted $8.5 million in loans funds to a State of Utah non-profit mortgage banking corporation. The corporation is based on nine similar community reinvestment corporations established in eight other states by a San Francisco-based non-profit organization that develops innovative financing programs for community development. The resources offered by the corporation provide critical private-sector financial leverage for state taxpayer monies to help mitigate a growing affordable housing crisis in Utah. Another goal of the corporation is to provide assistance for developers to build affordable housing. Funds are available for new construction and the acquisition and rehabilitation of existing properties. One loan fund project, for which Ally provided $3 million in loan funds, was a mixed-use project including 102 affordable residential apartments with more than 52,000 square feet of commercial space whose primary users are part of the local arts community. The project has been instrumental in revitalizing a neighborhood with large parcels of under-utilized land. The borrower is planning additional development nearby that will further improve the area.

- Ally provided $5 million in loan funds to a small business loan fund. Since inception in 2004, the loan fund has invested over $250 million in more than 4,000 different small business loans. The small business loan recipients have created or retained approximately 25,000 jobs, primarily in low- and moderate-income communities. The loan fund also manages a Community Development Financial Institution (CDFI) Fund that was awarded a $50 million allocation of New Markets Tax Credits (NMTC) in May, 2009. This allocation allowed the small business loan fund to provide subsidized loans to small businesses located in low- and moderate-income areas through a network of community focused lending partners.

- Ally granted $1 million in loan funds to a CDFI designed to provide financing and management support to entrepreneurs who are unable to access traditional sources of financing, especially those who are socially and/or economically disadvantaged. The CDFI is a partnership of local banks, industrial loan corporations, and private and public enterprises. A board of trustees composed of representatives of these entities oversees operations and establishes operating policies for the CDFI's loan fund. The loan fund is designed to provide a modestly secured form of financing for up to $10,000 for entrepreneurs who are unable to secure conventional credit because of the lack of capital, collateral and/or poor credit history.

Innovative or Flexible Lending Practices

The institution's innovative and flexible lending practices are evaluated pursuant to the following criteria: 1) the degree to which the loans serve low- and moderate-income creditworthy borrowers in new ways or serve groups of creditworthy borrowers not previously served by the institution; and 2) the success of each product, including the number and dollar volume of loans originated during the review.

Conclusion:

Ally makes limited use of innovative and/or flexible lending practices in order to serve assessment area credit needs.

The residential mortgage loans that were reported on Ally's HMDA LAR during the evaluation period consisted primarily of traditional mortgage loan products that were sold in the secondary market. The flexible lending products offered by Ally during the evaluation period consisted of various government sponsored loan programs such as Federal Housing Authority (FHA) loans which offer more liberal debt service ratios and lower down payment requirements than many conventional loans. During the evaluation period, Ally originated and purchased 2,652 FHA loans totaling $558.9 million inside of the designated assessment area, and 124,896 FHA loans totaling $23.1 billion throughout the United States.

Ally also offered mortgage loans guaranteed by the U.S. Department of Veterans Affairs (VA). VA loans are designed to offer long-term financing to eligible American veterans. These loans allow veterans to qualify for 100 percent financing without private mortgage insurance. During the evaluation period, Ally originated and purchased 321 VA loans totaling $70.6 million inside of the designated assessment area. Overall, Ally originated and purchased 50,656 VA loans totaling $10.1 billion throughout the United States.

INVESTMENT TEST

Scope of Test

The investment test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through its use of qualified investments that benefit the assessment area(s) or a broader statewide or regional area that includes the institution's assessment area(s). Activities considered under the lending or service test may not be considered under the investment test. The institution's investment performance is evaluated pursuant to the following criteria: 1) the dollar amount of qualified investments; 2) the innovativeness or complexity of qualified investments; 3) the responsiveness of qualified investments to credit and community development needs; and 4) the degree to which the qualified investments are not routinely provided by private investors.

Conclusion:

Ally has obtained a significant level of qualified community development investments, though rarely in a leadership role, and exhibits adequate responsiveness to credit and community economic development needs. The majority of Ally's investments address the identified need for affordable housing in the assessment area. Ally occasionally uses complex investments to support community development initiatives, such as Low-Income Housing Tax Credit (LIHTC) and Small Business Investment Company (SBIC) investments, while its other investments were routinely available in the market. Table O summarizes the number and dollar volume of both qualified investments and qualified donations made by Ally.

Table O – Qualified Investment and Grant Activity		
Investment Type	**#**	**$ (000s)**
Mortgage Backed Securities	74	348,040
Municipal Bonds (Affordable Housing Program)	2	1,835
Low-Income Housing Tax Credits (LIHTCs)	4	22,751
Small Business Investment Company (SBIC)	6	53,000
Total Debt or Equity Investments	***86***	***425,626***
Total Qualified Grants and Donations	***90***	***843***
Retained Investments Qualified at Prior CRA Evaluations	***63***	***62,641***
Total Qualified Investments, Grants, and Donations	***239***	***489,110***

Source: Bank Records

As reflected in Table O, Ally's qualified investment and grant activity totals $489.1 million. Ally manages approximately $488.3 million in qualified investments, of which $62.6 million were made during previous CRA evaluations. The investments represent mortgage-backed securities, affordable housing bonds, LIHTC and SBIC investments. The significant majority of new qualified investments obtained during the evaluation period were mortgage-backed securities. The mortgages that provided the collateral for these securities were exclusively for loans that were originated to low- and moderate-income borrowers residing throughout Ally's assessment area. Ally also purchased several state affordable housing bonds. The state affordable housing agency was established to facilitate the development and purchase of affordable housing for low-income people. The agency raises capital through the issuance of bonds and uses the funds to facilitate low-income housing programs. These include low interest, low down-payment mortgages; rent subsidization programs; and development of low-income housing projects.

Qualified grants and donations totaled approximately $843,000. The grants and donations were provided to organizations that were created to meet the community development needs in Ally's assessment area and the broader statewide or regional area.

Ally's total qualified investment and grant activity represents 0.8 percent of total assets, 5.9 percent of total equity capital, and 7.4 percent of the outstanding securities portfolio, as of June 30, 2010. While the total dollar volume of qualified investment activity during the current evaluation period represents a significant increase over the prior CRA evaluation period, it must be noted that the bank's overall investment activity also increased significantly. For example, during the previous CRA evaluation, qualified investments represented 118.9 percent of the then outstanding securities portfolio. As noted above, that percentage decreased to 7.4 percent during the current evaluation. Tables P and Q summarize Ally's qualified investments and donations, respectively, by activity year and the primary community development purpose.

Table P – Qualified Investments by Activity Year and Community Development Purpose

Primary Community Development Purpose	Prior Period		Partial 2008		2009		2010		Total	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Affordable Housing	63	62,641	4	20,062	64	281,393	12	71,771	143	435,267
Community Services	0	0	0	0	0	0	0	0	0	0
Economic Development	0	0	1	15,000	4	28,000	1	10,000	6	53,000
Revitalize or Stabilize Community	0	0	0	0	0	0	0	0	0	0
Total	**63**	**62,641**	**5**	**35,062**	**68**	**309,393**	**13**	**81,771**	**149**	**488,267**

Source: Bank Records

Table Q – Qualified Donations by Activity Year and Community Development Purpose

Primary Community Development Purpose	Partial 2008		2009		2010		Total	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Affordable Housing	3	28	13	178	7	122	23	328
Community Services	8	66	27	161	22	200	57	427
Economic Development	0	0	4	32	2	30	6	62
Revitalize or Stabilize Community	0	0	2	6	2	20	4	26
Total	**11**	**94**	**46**	**377**	**33**	**372**	**90**	**843**

Source: Bank Records

As illustrated in Tables P and Q, the majority of qualified investments and grants serve the affordable housing and other community service needs of low- and moderate-income individuals. The majority of investments were purchased during 2009. Descriptions of Ally's more notable and/or complex investments and their impact on the assessment area follow:

- Ally participated in four Low Income Housing Tax Credit (LIHTC) projects accounting for $22.8 million in investments. A LIHTC is a dollar-for-dollar tax credit for affordable housing investments. It was created under the Tax Reform Act of 1986 that gives incentives for the utilization of private equity in the development of affordable housing aimed at low-income families. LIHTC projects account for nearly 90 percent of all affordable rental housing created. The tax credits are more attractive than tax deductions as they provide a dollar-for-dollar reduction in a taxpayer's federal income tax. The "passive loss rules" and similar tax changes made to the Tax Reform Act of 1986 greatly reduced the value of tax credits and deductions to individual taxpayers. As a result, almost all investors in LIHTC projects are corporations.

- One of these LIHTC investments, in which Ally invested $7 million, is a 15-year lease-to-own housing program. This program was designed to enable low-income people to eventually purchase their own home. The target population earns less than 50 percent of the area median income. The program uses federal LIHTCs, local government deferred debt financing, and state housing agency debt financing to build modest 3- and 4-bedroom homes in rural and urban communities around the state. After 15 years, the house can be sold to the tenant family for an amount equal to the deferred land note owed to the local government and the permanent loan owed to the state housing agency. Since its inception in 1993, the program has furnished 160 homes in rural and urban communities throughout Utah. Currently, three projects with 40 new lease-to-own homes in Midvale have received tax credit allocations. During the past fiscal year, 11 lease-to-own homes were built in Tooele County.

- Ally invested $13 million in a LIHTC equity fund. The fund financed a 73-unit affordable housing property targeting singles and couples at or below 39 percent the area median income. This new rental construction includes 31 studio and 42 one-bedroom units in Salt

Lake City, Utah. The fund provided $3.41 million to support the debt financing with total project costs of $9.5 million. This fund also financed the rehabilitation of an existing apartment building in Ogden, Utah. The project preserved 68 units for families with incomes at or below 40 percent of the area median income. The fund provided $2.4 million with total project costs of $5.9 million. The fund also financed another project in Ogden, Utah to acquire and rehabilitate an apartment building consisting of 72 units for families earning at or below 40 percent of the area median income. The fund provided $3 million with total project costs of $6.9 million.

- Ally worked with a Salt Lake City venture capital firm, to invest $22 million in a Small Business Investment Company (SBIC) fund. This SBIC provides critical investment capital to 12 small businesses in the Mountain West, California, and Pacific Northwest regions of the nation. The companies focus on hardware, software, information technology and related network opportunities. Of the businesses funded by the SBIC, two are based in Salt Lake City: a supplier of one of the most effective eCommerce platforms and a leading provider of enterprise solid-state technology and high-performance input/output solutions. The investment was used to scale up infrastructure to support rapidly increasing sales and support development of the next generation of technologies. Both small businesses used the investment capital to hire additional employees, expand product lines and, in turn, grow the business.

SERVICE TEST

Scope of Test

The service test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the institution's systems for delivering retail banking services and the extent and innovativeness of its community development services. The institution's retail banking services are evaluated pursuant to the following criteria: 1) the distribution of the institution's branches among geographies of different income levels; 2) the record of opening and closing branches, particularly branches located in low- and moderate-income geographies or that primarily serve low- or moderate-income individuals; 3) the availability and effectiveness of alternate systems for delivering retail banking services; and 4) the range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

In addition, the institution's community development services are evaluated pursuant to the following criteria: 1) the extent of community development services offered and used; 2) the innovativeness of community development services, including whether they serve low- and moderate-income customers in new ways or serve groups of customers not previously served; 3) the degree to which they serve low- and moderate-income areas or individuals; and 4) their responsiveness to available opportunities for community development services.

Conclusion:

Services do not vary in a way that inconveniences portions of the assessment area, particularly low- and moderate-income geographies and/or individuals. Ally does not operate any traditional retail banking offices where the public can conduct business. However, Ally does offer alternative delivery systems, including bank-by-phone and internet banking. Ally provides an adequate level of community development services.

Retail Banking Services

Branch Delivery System

Ally's main office is located in a middle-income census tract in Midvale, Utah. Ally did not open or close any branch offices during the evaluation period. Although Ally does not operate an

Automated Teller Machine (ATM) network, customers are able to access any ATM throughout the United States without incurring transaction fees. Ally does not charge customers for ATM usage, and if the operator of the ATM charges a fee, customers are refunded those amounts at the end of their statement cycle.

Alternate Delivery Systems

Alternate delivery systems are methods used by a bank to reach communities where Ally has no physical presence. Ally operates a website that allows customers to open various deposit accounts and certificates of deposit. The website also offers a free bill pay service, allows customers to transfer funds, and describes the different deposit products that are offered by Ally. In addition, the website offers a live "chat" option for customers to ask questions and to get assistance with opening accounts. Ally also operates a 24 hour telephone customer service line that can be used to open deposit accounts, transfer funds, and obtain account information such as which checks have been paid, which ATM withdrawals have cleared, and what deposits have been credited. While Ally's website contains detailed information about the various deposit products that are offered, there is no information pertaining to any loan products offered by the bank or its affiliates.

Community Development Services

The institution has provided an adequate level of community development services that focus on meeting the community needs and opportunities within the assessment area. Ally's employees and officers contributed their financial expertise to organizations serving the community development needs of the assessment area, frequently in leadership positions. Table R details Ally's qualified service hours by the year and by the primary community development purpose of the service.

Table R – Qualified Service Hours by Community Development Purpose

Qualifying Services	Activities	2008	2009	2010	Total by Purpose
Affordable Housing Development	Board and committee service to entities engaged in affordable housing development	11	65	23	**99**
Financial Literacy and Education for Students	Provision of financial literacy training to LMI students.	0	84	3	**87**
Financial Services to LMI Individuals	Provision of financial services/assistance to LMI individuals	28	315	278	**621**
Economic Development	Activities that promote economic development.	0	10	3	**13**
Other Qualifying Services	Board and committee service to entities engaged in other CD activities.	8	54	32	**94**
Total by Year		**47**	**528**	**339**	**914**

Source: Bank Records

Bank employees and officers contributed approximately a total of 914 qualified community development service hours benefiting Ally's assessment area over the review period. As illustrated in Table 12, the majority of the service hours were focused on meeting the financial service needs of LMI individuals within its AA. Examples of the community development service activities where Ally officers and staff provided financial expertise include the following:

- Several employees at all levels of the organization used their financial expertise to prepare tax returns for low-income wage earners in an Internal Revenue Service sponsored Volunteer Income Tax Assistance (VITA) program. The goal of the program is to help low- and moderate-income individuals and families increase their financial stability and long term economic independence. This program allows low-income taxpayers to have their tax returns prepared for them in order to increase available income and to ensure that they receive all applicable tax credits.

- Member of bank management provides financial expertise while serving on the Board of a non-profit, multi-bank community financial institution. The organization provides financing and management support to firms without traditional funding, primarily those socially and economically disadvantaged. The loan programs are designed to help small business owners who cannot qualify for traditional small business loans in Ally's assessment area and the broader statewide area.

- Members of bank management provide financial expertise while serving on the Board, executive, credit and finance committees of a neighborhood housing organization that works to meet the affordable housing needs of Salt Lake County residents. The purpose of this organization is to provide affordable housing for LMI individuals in Ally's assessment area and the broader statewide or regional area.

Discriminatory or Other Illegal Credit Practices

No discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs were identified prior to the issuance of this CRA Performance Evaluation.

APPENDIX A

SCOPE OF EXAMINATION TABLE

Ally Bank
SCOPE OF EXAMINATION: Ally Bank was examined in accordance with the "Large Bank" CRA performance procedures.
TIME PERIOD REVIEWED: Loan analysis: January 2008 through December 2009. Community development loans, investments, and services: August 18, 2008, through July 19, 2010.
PRODUCTS REVIEWED: HMDA (1-4 Family Residential Mortgage Loans, Purchase, Refinance, Home Improvement, Multi-family Loans)

LIST OF AFFILIATES AND PRODUCTS REVIEWED

AFFILIATE(S):	AFFILIATE RELATIONSHIP:	PRODUCTS REVIEWED:
None		

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION

ASSESSMENT AREA:	TYPE OF EXAMINATION:	BRANCHES VISITED:	OTHER INFORMATION:
MSA 36260	Full Scope	None	None
MSA 39340	Full Scope	None	None
MSA 41620	Full Scope	None	None

APPENDIX B

GLOSSARY

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 metropolitan area/assessment area.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide non-metropolitan median family income, it a person or geography is located outside an MSA.

Census tract: 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.

Combined Statistical Area (CSA): The larger area of which MSAs are component parts.

Community development: All Agencies have adopted the following language. 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.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and

dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. The equity investments are subject to limits specified by the bank's regulator. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community as well as to the financial and marketing needs of the bank. A CDC may purchase, own, rehabilitate, construct, manage and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization. Any real estate ownership should generAlly be temporary, with ownership reverting to members or organizations in the community.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. They procure loans and investments that conventional financial institutions are unable to invest in, and they link financing to other developmental activities. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. CDFIs share a common mission and can be chartered as a credit union or bank. CDFIs can also be unregulated nonprofit institutions that gather private capital from a range of social investors for community development lending or investing. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, microenterprise funds, and community development venture capital funds. A certified CDFI must meet eligibility requirements, which include: having a primary mission of promoting community development; serving an investment area or target population; providing development services; maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means; and not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

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 householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

Geography: A census tract 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 (for example, approved, denied, and withdrawn).

Home Mortgage Disclosure Loan Application Register (HMDA LAR): The HMDA LARs record all applications received for residential purchase, refinance, home improvement and temporary-to-permanent construction loans.

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings 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.

Household Income: Includes the income of the householder and all other persons that are age 15 and older in the household, whether related to the householder or not. Because many households consist of only one person, median household income is usually less than median family income.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

HUD Adjusted Income Data: The U.S. Department of Housing and Urban Development (HUD) issues annual estimates which update median family income from the metropolitan and non-metropolitan areas. HUD starts with the most recent U.S. Census data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

Low Income Housing Tax Credits: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended, which is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department, through the Internal Revenue Service, distributes low-income housing tax credits to housing credit agencies. The housing agencies allocate tax credits on a competitive basis. Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits or sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains in place throughout the compliance period, usually 30 years.

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 metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

Non-Metropolitan Area: All areas outside of metropolitan areas. The definition of non-metropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies; for example, there is generAlly both urban and rural territory within both metropolitan and non-metropolitan areas.

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.

Qualified Investments: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development to support the following endeavors: 1) affordable housing; 2) community services targeting low- and moderate-income individuals; 3) activities that promote economic development by financing small farms and small businesses; and 4) activities that revitalize or stabilize low- and moderate-income geographies.

Rated area: A rated area is a state or multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Rural Area: Territories, populations and housing units that are not classified as urban.

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.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specificAlly, "urban" consists of territory, persons, and housing units in: places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin) but excluding the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.