

PUBLIC DISCLOSURE

August 8, 2013

**Mortgage Lender Community Investment
PERFORMANCE EVALUATION**

MSA MORTGAGE, LLC

**5 FREMONT STREET
WINTHROP, MA 02152**

**DIVISION OF BANKS
1000 WASHINGTON STREET
BOSTON, MA 02118**

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this mortgage lender. The rating assigned to this mortgage lender does not represent an analysis, conclusion or opinion of the Division of Banks concerning the safety and soundness of this mortgage lender.

GENERAL INFORMATION

Massachusetts General Laws chapter 255E, section 8 and the Division of Banks' (Division) regulation 209 CMR 54.00, Mortgage Lender Community Investment (CRA for Mortgage Lenders), require the Division to use its authority when examining mortgage lenders subject to its supervision who have made 50 or more home mortgage loans in the last calendar year, to assess the mortgage lender's record of helping to meet the mortgage credit needs of the Commonwealth, including low- and moderate-income neighborhoods and individuals, consistent with the safe and sound operation of the mortgage lender. Upon conclusion of such examination, the Division must prepare a written evaluation of the mortgage lender's record of meeting the credit needs of the Commonwealth.

This document is an evaluation of the CRA performance of **MSA Mortgage, LLC (MSA)** prepared by the Division, the mortgage lender's supervisory agency, as of **August 8, 2013**.

SCOPE OF EXAMINATION

An evaluation was conducted using examination procedures, as defined by 209 CMR 54.00. A review of the Division's records, as well as the mortgage lender's public CRA file, did not reveal any complaints related to CRA.

The CRA examination included a comprehensive review and analysis, as applicable, of MSA's:

- (a) origination of loans and other efforts to assist low- and moderate-income residents, without distinction, to be able to acquire or to remain in affordable housing at rates and terms that are reasonable considering the lender's history with similarly-situated borrowers, the availability of mortgage loan products suitable for such borrowers, and consistency with safe and sound business practices;
- (b) origination of loans that show an undue concentration and a systematic pattern of lending resulting in the loss of affordable housing units;
- (c) efforts working with delinquent residential mortgage customers to facilitate a resolution of the delinquency; and
- (d) other efforts, including public notice of the scheduling of examinations and the right of interested parties to submit written comments relative to any such examination to the Commissioner, as, in the judgment of the Commissioner, reasonably bear upon the extent to which a mortgage lender is complying with the requirements of fair lending laws and helping to meet the mortgage loan credit needs of communities in the Commonwealth.

MSA's community investment performance is evaluated using two performance tests: the Lending Test and the Service Test. This evaluation considered MSA's lending and community development activities for the period of January 1, 2011 through December 31, 2012. The data and applicable timeframes for the Lending Test and the Service Test are discussed below.

The Lending Test evaluates the mortgage lender's community investment performance pursuant to the following five criteria: geographic distribution of loans, lending to borrowers of different incomes, innovative and flexible lending practices, fair lending, and loss of affordable housing.

Home mortgage lending for 2011 is presented in the geographic distribution, lending to borrowers of different incomes and the Minority Application Flow tables. The 2012 data for home mortgage lending is represented in the narrative to demonstrate a trend. The aggregate lending data is used for comparison purposes within the evaluation and is a measure of loan

demand. It includes lending information from all Home Mortgage Disclosure Act (HMDA) reporting lenders which originated loans in the Commonwealth of Massachusetts.

In addition to gathering and evaluating statistical information relative to a mortgage lender's loan volume, the CRA examination also reflects an in depth review of the entity's mortgage lending using qualitative analysis, which includes, but is not limited to: an assessment of the suitability and sustainability of the mortgage lender's loan products by reviewing the lender's internally maintained records of delinquencies and defaults as well as information publicly available through the Federal Reserve Banks and through local Registries of Deeds and through other sources available to the examination team. The examination included inspection of individual loan files for review of compliance with consumer protection provisions and scrutiny of these files for the occurrence of disparate treatment based on a prohibited basis.

The Service Test evaluates the mortgage lender's record of helping to meet the mortgage credit needs by analyzing the availability and effectiveness of a mortgage lender's systems for delivering mortgage loan products, the extent and innovativeness of its community development services, and, if applicable, loss mitigation services to modify loans and/or efforts to keep delinquent home borrowers in their homes.

MORTGAGE LENDER'S CRA RATING:

This mortgage lender is rated "Satisfactory."

- The distribution of borrowers by income level reflects, given the demographics of Massachusetts, an adequate record of serving the credit needs among individuals of different income levels, including those of low- and moderate-income.
- The geographic distribution of the lender's loans reflects an adequate dispersion in low- and moderate-income census tracts as it is reflective of the distribution of owner-occupied housing units in those census tracts.
- MSA offers a limited number of flexible lending products, which are provided in a safe and sound manner to address the credit needs of low- and moderate-income individuals.
- Fair lending policies and practices are considered adequate.
- MSA engages in an adequate level of mortgage lender services, community development services, and qualified investment in the Commonwealth

PERFORMANCE CONTEXT

Description of Mortgage Lender

On March 22, 2001, MSA was licensed as a limited liability company, organized under the laws of the Commonwealth of Massachusetts to provide mortgage services to buyers and sellers of real estate. The business is headquartered in Winthrop, Massachusetts and is licensed as a mortgage broker and mortgage lender in Massachusetts, New Hampshire, Vermont, Maine, Connecticut, and Florida..

The main office is located at 5 Fremont Street. MSA also has branch locations in Waitsfield, Vermont and 1881 Worcester Road, Framingham, Massachusetts. In addition to Massachusetts, MSA is licensed to do business in New Hampshire, Vermont, Rhode Island, Maine and Connecticut. MSA employs 12 underwriters and 18 originators.

The lender provides financing for first and second mortgages and home equity lines of credit. According to MSA's website they provide 10, 15, 20 and 30 year fixed mortgages and 3, 5, 7 and 10 year ARM's Conventional, Jumbo, Home Equity Lines, FHA, VA loans and Mass Housing Loans. All files are maintained in the lender's Winthrop office.

The lender is a Direct Endorsed lender for the Federal Housing Administration (FHA). MSA offers a variety of mortgage loan products to meet the needs of the Commonwealth's borrowers. MSA offers a number of flexible lending products through Freddie Mac and MassHousing which meet the needs of low- and moderate-income individuals and geographies including Home Possible and My Community programs as well as FHA loans which include loans to assist first-time homebuyers. Since the last CRA evaluation, MSA received a Fannie Mae Seller/Service License and also began offering MassHousing Loans.

MSA's volume includes 71 brokered loans with a dollar volume of \$7,060,092 and 2,198 retail loans with a dollar volume of \$643,205,775. Additionally, there were 988 wholesale loans with a dollar volume of \$295,741,062.

Demographic Information

The Division's regulation 209 CMR 54.00 requires mortgage lenders be evaluated on their performance within the Commonwealth of Massachusetts. Demographic data is provided below to offer contextual overviews of economic climate along with housing and population characteristics for the Commonwealth of Massachusetts.

2000 CENSUS DEMOGRAPHIC INFORMATION						
Demographic Characteristics	Amount	Low %	Moderate %	Middle %	Upper %	N/A %
Geographies (Census Tracts)	1,361	8.4	21.7	46.1	23.4	0.4
Population by Geography	6,349,097	5.8	20.5	47.6	26.0	0.1
Owner-Occupied Housing by Geography	1,508,248	1.6	12.8	54.0	31.6	0.0
Family Distribution by Income Level	1,587,537	20.5	17.7	22.3	39.5	0.0
Distribution of Low and Moderate Income Families Throughout AA Geographies	606,419	10.0	29.4	46.2	14.4	0.0
Median Family Income		\$65,318	Median Housing Value			\$202,268
Households Below Poverty Level		9.80%				

Source: 2000 US Census

Based on 2000 Census data, the Commonwealth of Massachusetts has a total population of just over 6.3 million people and a total of 2.6 million housing units. Of the total housing units, 1.5 million or 57.5 percent are owner-occupied, 935,332 or 35.7 percent are rental-occupied, and 6.8 percent were vacant units.

There were 2.4 million households in the Commonwealth with a median household income of \$53,686 as of the 2000 Census. Over 40 percent of the households were classified as low- and moderate-income. In addition, 9.8 percent of all households were living below the poverty level.

2010 CENSUS DEMOGRAPHIC INFORMATION						
Demographic Characteristics	Amount	Low %	Moderate %	Middle %	Upper %	N/A %
Geographies (Census Tracts)	1,474	10.8	20.0	40.7	27.1	1.4
Population by Geography	6,547,629	8.9	18.9	42.8	29.2	0.2
Owner-Occupied Housing by Geography	1,608,474	2.9	13.7	48.9	34.5	0.0
Family Distribution by Income Level	1,600,588	22.3	16.7	21.0	40.0	0.0
Distribution of Low and Moderate Income Families Throughout AA Geographies	624,701	15.0	27.0	40.9	17.1	0.0
Median Family Income		\$86,272	Median Housing Value		373,206	
Households Below Poverty Level		11.14%				
2012 HUD Adjusted Median Family Income		\$87,891	Unemployment Rate		6.7%**	

Source: 2010 US Census; *as of 12/31/2012

Based on the 2010 Census, the Commonwealth's population grew to just over 6.5 million people with a total of 2.7 million housing units. Of the total housing units, 1.6 million or 57.7 percent are owner-occupied, 904,078 or 32.5 percent are rental-occupied, and 9.8 percent are vacant units.

According to the 2010 Census, there are 2.5 million households in the Commonwealth with a median household income of \$69,101. Over 39 percent of the households are now classified as low- and moderate-income. In addition, over 11 percent of the total households are living below the poverty level. Individuals in these categories may find it challenging to qualify for traditional mortgage loan products.

Households classified as "families" grew from 1.5 million to slightly over 1.6 million from the 2000 Census to the 2010 Census. Of all family households in 2000, 20.5 percent were low-income, 17.7 percent were moderate-income, 22.3 percent were middle-income, and 39.5 percent were upper-income. The median family income according to the 2000 census was \$65,318. As of the 2010 Census, of all family households, 22.3 percent are low-income, 16.7 percent are moderate-income, 21.0 percent are middle-income, and 40.0 percent are upper-income. The median family income according to the 2010 census was \$86,272. The Housing and Urban Development (HUD) adjusted median family income is \$87,891. The adjusted median family income is updated yearly and takes into account inflation and other economic factors.

The Commonwealth of Massachusetts contained 1,361 Census tracts as of the 2000 Census. Of these, 114 or 8.4 percent were low-income; 295 or 21.7 percent were moderate-income; 628 or 46.1 percent were middle-income; 319 or 23.4 percent were upper-income; and 5 or 0.4 percent were NA or have no income designation. Based on the 2010 Census the number of Census tracts in the Commonwealth of Massachusetts grew to 1,474. Of these, 160 or 10.8 percent are low-income; 295 or 20.0 percent are moderate-income; 600 or 40.7 percent are middle-income; 399 or 27.1 percent are upper-income; and 20 or 1.4 percent are NA or have no income designation.

The tracts with no income designation are located in areas that contain no housing units and will not be included in this evaluation since they provide no lending opportunities. These areas are made up of correctional facilities, universities, military installations, and uninhabited locations such as the Boston Harbor Islands.

Low-income is defined as individual income that is less than 50 percent of the area median income. Moderate-income is defined as individual income that is at least 50 percent and less than 80 percent of the area median income. Middle-income is defined as individual income that is at least 80 percent and less than 120 percent of the area median income. Upper-income is defined as individual income that is more than 120 percent of the area median income.

The median housing value for Massachusetts was \$202,268 according to the 2000 Census. As of the 2010 Census, the median housing value was \$373,206. The unemployment rate for the Commonwealth of Massachusetts as of December 31, 2012, stood at 6.7 percent which was a decrease from December 31, 2011 at 6.9 percent. During this time frame, May 2012 saw the lowest unemployment rate within the year at 6.0 percent. Employment rates would tend to affect a borrower's ability to remain current on mortgage loan obligations and also correlates to delinquency and default rates.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

MSA's Lending Test performance was rated an overall "Satisfactory." MSA's lending efforts are rated under the five performance criteria: Geographic Distribution, Borrower Characteristics, Innovative or Flexible Lending Practices, Fair Lending Policies and Procedures, and Loss of Affordable Housing. The following information details the data compiled and reviewed, as well as conclusions on the mortgage lending of MSA.

I. Borrower Characteristics

The distribution of loans by borrower income levels was reviewed to determine the extent to which the lender is addressing the credit needs of the Commonwealth's residents.

MSA achieved an adequate record of serving the mortgage credit needs among borrowers of different income levels based on the area's demographics and a comparison to aggregate lending data in Massachusetts.

Table 1 illustrates HMDA loan originations, categorized by borrower income level, reported by MSA during 2011 and 2012, and compares this activity to the aggregate lending data (excluding MSA Mortgage) and the percentage of families by income level within the assessment area using the 2000 Census demographics (for the 2011 performance comparison) and compared with the percentage of families by income level using the 2010 Census demographics (for the 2012 performance comparison).

Borrower Income Level	% of Total Families (2000 Census)	2011 MSA Mortgage		2011 Aggregate Lending Data (% of #)	2012 MSA Mortgage		2012 Aggregate Lending Data (% of #)	% of Total Families (2010 Census)
		#	%		#	%		
Low	20.5	44	2.2	5.4	106	3.4	5.2	22.3
Moderate	17.7	248	12.2	15.4	538	17.5	15.7	16.7
Middle	22.3	533	26.3	22.3	925	30.1	23.1	21.0
Upper	39.5	1,203	59.3	41.3	1,507	48.9	42.6	40.0
NA	0.0	1	0.1	15.7	2	0.1	13.4	0.0
Total	100.0	2,029	100.0	100.0	3,078	100.0	100.0	100.0

Source: 2011 HMDA Data and 2000 U.S Census, 2012 HMDA Data and 2010 U.S. Census

As shown in Table 1, MSA's performance, in relation to the aggregate and percentage of families, for low- and moderate- income borrowers fell short in 2011 for both low- and moderate-income borrowers. However, 2012 showed a positive trend in both number and percentage of loans to these categories of borrowers with MSA exceeding the aggregate in lending to moderate-income borrowers.. As such, MSA Mortgage's lending performance is considered reasonable.

A large percentage of the loan volume occurred through retail originations on refinance transactions. Two retail originators were added in the Framingham branch office, combined with low interest rates contributed to the overall increase in loan volume from 2011 to 2012.

In addition, the increase in lending to low- and moderate-income borrowers in 2012 was due to the fact MSA began offering MassHousing loan products in 2011. These products have flexible lending terms and make obtaining home financing more affordable for low- and moderate-income borrowers. In 2012, the volume of this loan product increased and MSA originated 114 MassHousing loans. In addition, MSA Mortgage originated 299 FHA loans.

Overall, the distribution of originations by borrower income reflects adequate performance.

II. Geographic Distribution

The geographic distribution of loans was reviewed to assess how well MSA Mortgage is addressing the credit needs in all geographies throughout the Commonwealth of Massachusetts.

The mortgage lender's distribution of lending in the Commonwealth when compared to the demographic and aggregate lending data was adequate.

Table 2 summarizes the 2011 and 2012 home mortgage lending categorized by census tract income level. The lending activity is compared with the percent of owner-occupied housing units based on the 2000 and 2010 Census, and MSA's home mortgage lending performance is further compared to aggregate lending performance.

Table 2 Distribution of Home Mortgage Loans by Census Tract Income Level								
Census Tract Income Level	% of Owner-Occupied Housing Units (2000 Census)	2011 MSA Mortgage		2011 Aggregate Lending Data (% of #)	2012 MSA Mortgage		2012 Aggregate Lending Data (% of #)	% of Owner-Occupied Housing Units (2010 Census)
		#	%		#	%		
Low	1.6	19	0.9	1.3	62	2.0	2.2	2.9
Moderate	12.8	168	8.3	10.1	296	9.6	10.2	13.7
Middle	54.0	914	45.1	49.0	1390	45.2	45.2	48.9
Upper	31.6	928	45.7	39.6	1328	43.1	42.3	34.5
N/A	0.0	0	0.00	0.0	2	0.1	0.1	0.0
Total	100.0	2,029	100.0	100.0	3,078	100.0	100.0	100.0

Source 2011 HMDA Data and 2000 U.S. Census/ 2012 HMDA Data/2010 U.S. Census

The mortgage lender's geographic distribution of loans was below the distribution of owner-occupied housing units and the aggregate lending data in 2011 in low- and moderate-income census tracts. In 2012, MSA Mortgage' lending to low-and moderate-income census tracts increased significantly in both number and percentage.

The current geographic distribution of MSA's main office in Winthrop, MA and the two branch office locations are accessible to low-, moderate-, middle-, and upper-income geographies. Overall, the distribution of loans reflects MSA's willingness to lend in all census tracts and demonstrates an adequate performance in the Commonwealth.

III. Innovative and Flexible Lending Practices

MSA offers flexible lending products, which are provided in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

MSA originates Federal Housing Administration loans (FHA) which offer low down payments and liberal qualifying ratios. During the period of the examination, MSA funded 299 FHA loans of which 101 benefited low-and moderate-income borrowers.

MSA offers MassHousing loan products. MassHousing is a public agency in Massachusetts that provides financing for homebuyers and homeowners, and for developers and owners of affordable rental housing. In 2011 and 2012, MSA originated 114 MassHousing loans with a dollar volume of \$30,204,019.

IV. Fair Lending

The Division examines a mortgage lender's fair lending policies and procedures pursuant to Regulatory Bulletin 1.3.106. The mortgage lender's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. The review included, but was not limited to, review of written policies and procedures, interviews with mortgage lender personnel, and individual file review.

MSA has established an adequate record relative to fair lending policies and practices. MSA's fair lending policy is outlined in the Lender's overall lending policy.

MSA has an internal quality control checklist that covers areas of compliance and fair lending. Other quality control measures are taken that involve third party audits. The most recent quality control report and most recent compliance monitoring reports were conducted in May 2013 and occur on a quarterly basis.

All denied loan files must be reviewed by the Compliance Officer before a denial notice is issued to the borrower.

MSA has adequate complaint resolution procedures and no CRA related complaints were received.

MSA periodically reviews marketing materials, loan programs, rate sheets and underwriting criteria to ensure uniformity in presenting products and programs to meet the credit needs in the community and area.

MINORITY APPLICATION FLOW

For 2011 and 2012 MSA received 6,285 HMDA-reportable loan applications from within the Commonwealth of Massachusetts. Of these applications 289, or 9.5 percent, were received from minority applicants, of which 78.2 percent, or 226, resulted in originations. MSA received 3.5 percent of HMDA reportable applications from ethnic groups of Hispanic origin within its assessment area.

Demographic information for Massachusetts reveals the total ethnic and racial minority population stood at 23.8 percent of the total population as of the 2010 Census. This segment of the population is comprised of the 9.5 percent Hispanic or Latino, 5.9 percent Black, 5.33 percent at Asian/Pacific Islander, 0.16 percent American Indian/Alaskan Native, and 2.81 percent identified as Other Race.

Refer to the following table for information on the mortgage lender's minority application flow as well as a comparison to aggregate lenders throughout the Commonwealth of Massachusetts. Compiling this data assists in deriving reasonable expectations for the rate of applications the mortgage lender received from minority applicants.

MINORITY APPLICATION FLOW						
RACE	2011 Aggregate Data	2011 MSA		2011 Aggregate Data	2012 MSA	
	%	Amt	%	%	Amt	%
American Indian/ Alaska Native	0.1	2	0.1	0.1	2	0.1
Asian	4.5	102	3.9	7.4	73	1.9
Black/ African American	1.9	8	0.3	0.7	30	0.8
Hawaiian/Pac Isl.	0.1	1	0.1	0.1	0	0.0
2 or more Minority	0.1	0	0.00	0.1	0	0.0
Joint Race (White/Minority)	1.1	37	1.4	1.2	34	0.9
Total Minority	7.8	150	5.8	9.6	139	3.7
White	68.1	1,945	75.7	66.3	2,647	71.3
Race Not Available	24.1	475	18.5	24.1	929	25.0
Total	100.0	2,570	100.0	100.0	3,715	100.0
ETHNICITY						
Hispanic or Latino	2.1	34	1.4	3.3	43	1.2
Not Hispanic or Latino	73.1	1993	77.5	71.8	2,711	73.0
Joint (Hisp/Lat /Not Hisp/Lat)	0.7	16	0.6	0.7	16	0.4
Ethnicity Not Available	24.1	527	20.5	24.2	945	25.4
Total	100.0	2,570	100.0	100.0	3,715	100.0

Source: 2011 & 2012 HMDA Data

In 2011, MSA Mortgage's performance was below the aggregate's performance for racial minority applicants. The lender received 5.84 percent of its applications from racial minorities in 2011, while the aggregate received 7.88 percent. The mortgage lender's performance was slightly below the aggregate for applications from ethnic minorities of Hispanic origin in 2011. MSA received 2.0 percent of its applications from Hispanic applicants, while the aggregate received 2.8 percent. Performance for 2012 reflected a relatively small decrease in number of applications from racial minorities while the number of applications from Hispanic or Latino applicants increased. However, given the increase in total volume, percentage of applications received from both racial and ethnic minorities declined while the aggregate increased.

MSA makes its services available to all applicants in the Commonwealth. The lender must continue to monitor its advertising and outreach efforts to ensure all segments of the population are accessed.

V. *Loss of Affordable Housing*

This review concentrated on the suitability and sustainability of mortgage loans originated by MSA by taking into account delinquency and default rates of the mortgage lender and those of the overall marketplace. Information provided by the lender was reviewed as were statistics available on delinquency and default rates for mortgage loans. Additionally, individual mortgage loans were tracked for their status through local Registries of Deeds and other available sources including public records of foreclosure filings.

An extensive review of information and documentation, from both internal and external sources as partially described above, did not reveal lending practices or products that showed an undue

concentration or a systematic pattern of lending, including a pattern of early payment defaults, resulting in the loss of affordable housing units. Further, delinquency rates were found to be consistent with industry averages.

SERVICE TEST

The service test evaluates a mortgage lender's record of helping to meet the mortgage credit needs in the Commonwealth by analyzing both the availability and effectiveness of a mortgage lender's systems for delivering mortgage loan products; the extent and innovativeness of its community development services; and loss mitigation services to modify loans or otherwise keep delinquent home loan borrowers in their homes. Community development services must benefit the Commonwealth or a broader regional area which integrates the Commonwealth.

MSA's Service Test performance was determined to be adequate and was rated an overall "Satisfactory" at this time.

Mortgage Lending Services

MSA provides an effective delivery of mortgage lender services that are accessible to geographies and individuals of difference income levels in the Commonwealth.

MSA generates the majority of its applications through referrals, repeat customers and broker relationships. Applications are received at MSA's main office location located in a middle-income geography. During the examination period, mortgage applications were also received at the Framingham and Boston locations, both of which were located in upper-income geographies.

MSA further demonstrates its effective delivery of mortgage lending services as a Fannie Mae Seller Servicer. The lender has been an approved Fannie Mae Seller Servicer since 2010. As a Fannie Mae Seller Servicer, the lender that has approval to sell loans to Fannie Mae and to service loans on Fannie Mae's behalf. Loans that are originated by MSA Mortgage are sold to Fannie Mae with servicing rights released.

As MSA does not routinely service mortgage loans, it would not work directly with delinquent borrowers. Therefore, this review would not include an evaluation of loan mitigation and modification efforts as the mortgage lender would not be accountable for such action. However, as described above, lending practices and products did not show an undue concentration or a systematic pattern of lending resulting in mortgage loans that were not sustainable.

Community Development Services

A community development service is a service that:

- (a) has as its primary purpose community development; and
- (b) is related to the provision of financial services, including technical services

The Commissioner evaluates community development services pursuant to the following criteria:

- (a) the extent to which the mortgage lender provides community development services; and
- (b) the innovativeness and responsiveness of community development services..

The mortgage lender's level of involvement in community development services shows an adequate responsiveness to the needs of its assessment area.

The President of MSA is an active member of the Viking Pride Foundation and has demonstrated a commitment by volunteering time and financial expertise to the Foundation. The Foundation was formed in 2004, in the Town of Winthrop, to provide financing for co-curricular activities and events in the Winthrop Public Schools. With the help of the Viking Pride Foundation, the student user fee is reduced and makes extra-curricular activities more affordable to students, with specific impact for students from low- and moderate-income families. The percentage of students from low-income families in the Winthrop School system is close to 20.0 percent.

On a yearly basis, MSA participates in a winter jacket drive during the holiday season. In 2012, 25 employees donated winter jackets to children from low- and moderate-income families. MSA sponsored a drop off location in the Town of Winthrop.

In October 2012, MSA provided 300 backpacks to children 12 years of age and under from Winthrop and East Boston, a neighborhood of the City of Boston consisting primarily of low- and moderate-income census tracts.

Qualified Investments

During the examination period, MSA donated \$15,000 to organizations that meet the definition of community development. Organizations that benefited from these donations include:

Viking Pride Foundation: As previously mentioned, supports the financing of co-curricular activities and events in the Winthrop Public Schools.

Realtors Against Poverty: The organization's goal is to help families in need in the entire Middlesex County. Donations go towards providing basic necessities such as, clothing and food to families who cannot afford these items on their own.

HomeStart, Inc.: The organization was formed in 1994 and helps to place homeless families and adults in the Greater Boston area into affordable housing. Beyond housing placement, stabilization advocates help each participant reintegrate into the community, maintain successful housing, and break the cycle of chronic homelessness. Money management services are also provided.

Citizens Housing and Planning Association (CHAPA): This is a non-profit umbrella organization for affordable housing and community development activities in Massachusetts. Their mission is to encourage the production and preservation of housing that is affordable to low- and moderate-income families and individuals by fostering diverse and sustainable communities through planning and community development. CHAPA's main services include: Housing Advocacy, Research, Community Education and Training.

PERFORMANCE EVALUATION DISCLOSURE GUIDE

Massachusetts General Laws Chapter 255E, Section 8, and 209 CMR 54.00, the Mortgage Lender Community Investment (CRA) regulation, requires all mortgage lenders to take the following actions within 30 business days of receipt of the CRA evaluation of their mortgage lender:

- 1) Make its most current CRA performance evaluation available to the public.
- 2) Provide a copy of its current evaluation to the public, upon request. The mortgage lender is authorized to charge a fee which does not exceed the cost of reproduction and mailing (if applicable).

The format and content of the mortgage lender's evaluation, as prepared by the Division of Banks, may not be altered or abridged in any manner. The mortgage lender is encouraged to include its response to the evaluation in its CRA public file.

The Division of Banks will publish the mortgage lender's Public Disclosure on its website no sooner than 30 days after the issuance of the Public Disclosure.