

PUBLIC DISCLOSURE

June 2, 2014

**CRA FOR MORTGAGE LENDERS
PERFORMANCE EVALUATION**

**RADIUS FINANCIAL GROUP INC.
ML1846**

**600 LONGWATER DRIVE
SUITE 107
NORWELL, MA 02061**

**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 et seq., Mortgage Lender Community Investment (CRA), 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 **Radius Financial Group Inc. (Radius Financial or the Lender)** prepared by the Division, the mortgage lender's supervisory agency, as of **June 2, 2014**.

SCOPE OF EXAMINATION

An evaluation was conducted using examination procedures, as defined by CRA. 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 Radius Financial'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.

CRA examination procedures were used to evaluate Radius Financial's community investment performance. These procedures utilize two performance tests: the Lending Test and the Service Test. This evaluation considered Radius Financial's lending and community development activities for the period of January 1, 2012 through December 31, 2013. 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 2012 and 2013 is presented in the geographic distribution, lending to borrowers of different incomes and the Minority Application Flow tables. Comparative analysis is provided for the mortgage lender's 2012 lending performance as this is the most recent year for which aggregate HMDA lending data is available. 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 lenders required to report loan application information pursuant to the Home Mortgage Disclosure Act (HMDA) 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 "High Satisfactory."

- The distribution of borrowers reflects, given the demographics of Massachusetts, an excellent record of serving the credit need among individuals of different income levels, including those of low- and moderate-income.
- The geographic distribution of the mortgage lender's loans reflects good dispersion in low- and moderate-income census tracts.
- Radius Financial offers a good 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 good.
- Radius Financial provided an adequate level of Community Development Services in the Commonwealth.

PERFORMANCE CONTEXT

Description of Mortgage Lender

Radius Financial was granted a mortgage lender (ML1846) by the Division on March 14, 2000. The mortgage lender's corporate office is located at 600 Longwater Drive in Norwell, Massachusetts. The mortgage lender is also licensed in Connecticut, Florida, Maine, New Hampshire and Rhode Island.

The mortgage lender's business focuses on the retail origination and underwriting of conventional and government-insured loans. All underwriting and approvals are processed at the Lender's office in Norwell. Loans are sold or assigned to secondary market investors on a servicing released basis. All closed loans are funded under the Lender's warehouse line of credit. Radius Financial's residential mortgage lending business is generated through referrals from more than 40 licensed loan originators operating out of the Lender's four Massachusetts branches and one New Hampshire branch. Radius Financial is an approved FHA Direct Endorsement and VA lender. Approvals were granted on May 28, 2004 and January 2, 2001, respectively.

Demographic Information

The CRA regulation requires mortgage lenders to 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.

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	19.3	17.7	24.4	38.6	0.0
Distribution of Low and Moderate Income Families	592,420	7.7	18.4	43.6	30.3	0.0
Median Family Income	\$86,272	Median Housing Value				373,206
Households Below Poverty Level	11.14%	Unemployment Rate				7.0%*
2012 HUD Adjusted Median Family Income	\$87,891	2013 HUD Adjusted Median Family Income				\$84,208

*Source: 2010 US Census *as of 12/31/2013*

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 classified as low- and moderate-income. In addition, over 11 percent of the total number of 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" totaled slightly over 1.6 million. Of all family households, 19.3 percent were low-income, 17.7 percent were moderate-income, 24.4 percent were middle-income, and 38.6 percent were 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 in 2012 and \$84,208 in 2013. The adjusted median family income is updated yearly and takes into account inflation and other economic factors.

The Commonwealth of Massachusetts contained 1,474 Census tracts. 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 \$373,206 according to the 2010 Census. The unemployment rate for the Commonwealth of Massachusetts as of December 31, 2013, stood at 7.0 percent which was an increase from December 31, 2012 at which time it stood at 6.7 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

Radius Financial's Lending Test performance was rated an overall "High Satisfactory." Lending performance is 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 Radius Financial.

I. Borrower Characteristics

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

Radius Financial achieved an excellent 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.

The following table shows, by number, HMDA reportable loans to low, moderate, middle and upper-income borrowers in comparison to the aggregate and the percentage of total families within the Commonwealth in each respective income group.

<i>Distribution of HMDA Loans by Borrower Income</i>							
<i>Median Family Income Level</i>	<i>% of Families</i>	2012 Radius Financial		2012 Aggregate Lending Data	2013 Radius Financial		2013 Aggregate Lending Data
		#	%	(% of #)	#	%	(% of #)
<i>Low</i>	19.3	121	7.3	5.2	111	7.8	5.4
<i>Moderate</i>	17.8	245	20.8	15.7	370	25.9	15.9
<i>Middle</i>	24.4	440	26.5	23.2	419	29.4	22.9
<i>Upper</i>	38.5	685	41.3	42.6	504	35.3	43.7
<i>NA*</i>	0.0	67	4.0	13.3	23	1.6	12.1
<i>Total</i>	100.0	1,658	100.0	100.0	1,427	100.0	100.0

Source: 2012 & 2013 HMDA Data and 2010 U.S. Census

As shown in the above table, Radius Financial's 2012 lending to low- and moderate-income borrowers was above aggregate lending. When compared to the percentage of families in each respective income group, the mortgage lender's lending to moderate-income borrowers at 20.8 percent was also above the demographics. Lending to low-income borrowers was below the demographics, however, according to the 2010 Census, 11.4 percent of the families within the Commonwealth have incomes below the poverty threshold and would most likely not qualify for home ownership.

Although there was a slight decrease in lending from 2012 to 2013, the percentage of lending to low- and moderate-income borrowers increased, as did loans to moderate-income borrowers in 2013, showing a positive trend. The distribution of lending for 2013 remained above the aggregate.

II Geographic Distribution

The geographic distribution of loans was reviewed to assess how well Radius Financial is addressing the credit needs throughout the Commonwealth of Massachusetts' low-, moderate-, middle-, and upper-income census tracts.

Radius Financial's distribution of lending in the Commonwealth when compared to the demographics and aggregate lending data was good. The table below shows the distribution of HMDA-reportable loans by census tract income.

Distribution of HMDA Loans by Income Category of the Census Tract							
Census Tract Income Level	% Total Owner-Occupied Housing Units	2012 Radius Financial		2012 Aggregate Lending Data	2013 Radius Financial		2013 Aggregate Lending Data
		#	%	(% of #)	#	%	(% of #)
Low	2.9	18	1.1	2.1	40	2.8	2.9
Moderate	13.7	123	7.4	10.2	178	12.5	12.3
Middle	48.9	896	54.0	45.1	764	53.5	46.0
Upper	34.5	621	37.5	42.5	445	31.2	38.8
Total	100.0	1,658	100.0	100.0	1,427	100.0	100.0

Source 2012 & 2013 HMDA Data and 2010 U.S. Census

The mortgage lender's geographic distribution of loans in low- and moderate-income tracts was below that of the distribution of owner-occupied housing units as well as the aggregate's lending data in those tracts during 2012. However, while Radius Financial's overall lending volume decreased slightly from 2012 to 2013, the mortgage lender increased the number and percentage of lending in both low- and moderate-income tracts, and was consistent with the performance of the aggregate lending percentages for 2013.

Although approximately 2.9 percent and 13.7 (2010 Census) percent of owner occupied housing reside in low- and moderate-income geographies, respectively, these tracts contain a significant percentage of rental occupancy at 47.4 percent of all of the rentals units in the Commonwealth.

The mortgage lender's geographic distribution of residential real estate loans reflects a good distribution throughout its assessment area.

III. Innovative or Flexible Lending Practices

Radius Financial offers a good number and variety of 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.

Radius Financial is directly endorsed by Housing and Urban Development (HUD) to underwrite Federal Housing Administration (FHA) insured mortgages. The mortgage lender also offers Veterans Association (VA) and United States Department of Agriculture (USDA) guaranteed loans as a correspondent lender. In 2012 Radius Financial ranked in the top 7 percent of market share for FHA and VA loan production in Massachusetts. The FHA, VA and USDA products offered by Radius Financial provide competitive interest rates and smaller down payments for low- and moderate-income first-time homebuyers and existing homeowners.

Radius Financial offers a variety of FHA products, including FHA loans with FICO scores under 620, which is below the mortgage industry's standard minimum. These FHA loans are manually underwritten to provide sustainable loans with competitive interest rates for low- and moderate-income homeowners who would otherwise not have been approved due to past credit history. Additionally, Radius Financial offers the FHA 203k Rehabilitation loan program, which is HUD's primary program for the rehabilitation and repair of single family properties.

During the review period of 2012 to 2013, the mortgage lender closed 846 FHA loans totaling \$222.8 million. Of the 846 FHA loans closed during the examination period, 398 were originated to low- or moderate-income borrowers and 154 benefited low- and moderate-income geographies in the Commonwealth.

The VA Home Loan Guarantee Program is designed specifically for the unique challenges facing service members and their families. The program offers low closing cost, no down payment requirement, and no private mortgage insurance requirement. During 2013, Radius Financial originated 17 VA loans totaling \$5.4 million. Of these, four loans were originated to moderate-income level consumers.

The USDA Rural Housing Program is an innovative loan program for eligible homebuyers in rural-designated areas. For home purchase transactions, the program offers fixed interest rates, and 100 percent financing with no down payment requirement. Income requirements do apply and borrowers can earn no more than 115 percent of the HUD median income for their area, adjusted by family size. The property must be located in a rural development designated area. Radius Financial originated 98 USDA loans totaling \$21.5 million during the examination period, of which more than half benefited low- or moderate-income consumers or geographies.

Radius Financial works with CitiBank to offer premium pricing for loans originated by Radius Financial where the property address is located in either a low- to moderate-income census tract or the household's qualified income is below 80 percent of the MSA median income. During the examination period the mortgage lender originated 250 loans totaling over \$55 million which met these requirements within Massachusetts.

The above flexible loan programs are an important tool for community and neighborhood revitalization and show Radius Financial's commitment to increasing homeownership opportunities for Massachusetts families.

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. No evidence of disparate treatment was identified.

Radius Financial has established a good record relative to fair lending policies and practices. The fair lending policies and procedures apply to all residential mortgage transactions, products types, and geographies. Fair lending is further enforced through annual training courses which all staff including management are required to take. All loans are monitored for compliance by quarterly quality control audits which review samples of loan files pre- and post-closing. Radius Financial has a bi-annual fair lending audit conducted in addition to monthly internal HMDA monitoring and a secondary review of all denied loans before a final decision is made in an effort to proactively monitor for possible fair lending concerns.

MINORITY APPLICATION FLOW

For 2012 and 2013 Radius Financial received 3,788 HMDA-reportable loan applications from within the Commonwealth of Massachusetts. Of the 1982 applications received in 2012, 139 or 7.1 percent were received from minority applicants, of which 100 or 71.9 percent resulted in originations. Radius Financial received 98 or 4.9 percent of HMDA reportable applications from ethnic groups of Hispanic origin within its assessment area, of which 72 or 73.4 percent were originated. Radius Financial's approval of racial and ethnic minority applicants at 71.9 and 73.4 percent are above the aggregate's approval rates at 60.6 percent and 53.5 percent, respectively.

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 9.6 percent Hispanic or Latino. Racial minorities consisted of 6.0 percent Black; 5.3 percent Asian/Pacific Islander; 0.2 percent American Indian/Alaskan Native; and 2.8 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. The comparison of this data assists in deriving reasonable expectations for the rate of applications the mortgage lender received from minority applicants.

MINORITY APPLICATION FLOW						
RACE	2012 Radius Financial		2012 Aggregate Data	2013 Radius Financial		2013 Aggregate Data
	#	%	% of #	#	%	% of #
<i>American Indian/ Alaska Native</i>	1	0.1	0.1	0	0.0	0.2
<i>Asian</i>	43	2.3	4.8	43	2.4	4.8
<i>Black/ African American</i>	63	3.1	1.7	69	3.8	2.4
<i>Hawaiian/Pac. Isl.</i>	3	0.1	0.1	1	0.1	0.1
<i>2 or more Minority</i>	0	0.0	0.1	0	0.0	0.0
<i>Joint Race (White/Minority)</i>	29	1.5	1.2	20	1.1	1.2
Total Minority	139	7.1	8.0	133	7.4	8.7
<i>White</i>	1,804	91.0	69.5	1,646	91.1	69.5
<i>Race Not Available</i>	39	1.9	22.5	27	1.5	21.8
Total	1,982	100.0	100.0	1,806	100.0	100.0
ETHNICITY						
<i>Hispanic or Latino</i>	70	3.5	2.1	94	5.2	2.8
<i>Not Hispanic or Latino</i>	1,850	93.4	74.7	1,658	91.8	74.7
<i>Joint (Hisp/Lat /Not Hisp/Lat)</i>	28	1.4	0.8	31	1.7	0.9
<i>Ethnicity Not Available</i>	34	1.7	22.4	23	1.3	21.6
Total	1,982	100.0	100.0	1,806	100.0	100.0

Source: 2000 U.S. Census Data, 2012 & 2013 HMDA Data

In 2012, Radius Financial's performance was below the aggregate's performance for racial minorities and above to ethnic minority applicants at 7.1 and 4.9 percent, respectively. The number and percentage of total minority applicants increased, although there was a decrease in overall applications from 2012 to 2013. Overall, the minority application flow is considered reasonable.

V. Loss of Affordable Housing

This review concentrated on the suitability and sustainability of mortgage loans originated by Radius Financial by taking into account delinquency and default rates of the mortgage lender and those of the overall marketplace. Information provided by the mortgage 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 that includes the Commonwealth.

Radius Financial's Service Test performance was determined to be "Satisfactory" during the evaluation period.

Mortgage Lending Services

Radius Financial provides a good level of mortgage lending services to low- and moderate-income geographies and borrowers through home purchase and refinance transactions in Massachusetts. The mortgage lender offers a variety of conventional and government insured mortgage products, including sustainable FHA loans for applicants with below average credit scores. Customers can apply to Radius Financial for a mortgage in person, over the telephone or via the company's website, with a licensed loan originator. Presently, Radius Financial maintains five active branch offices in addition to the mortgage lender's corporate office located in Norwell. These branches are located in Westwood, West Springfield, Orleans and Scituate, Massachusetts as well as the Bedford, New Hampshire branch; two are located in moderate-income census tracts and all service Massachusetts consumers. Business development relies primarily on referrals from the real estate industry and repeat customers. Radius Financial employs a staff of nearly 80 employees who speak a variety of languages including Spanish, Portuguese and Russian to originate, process and underwrite mortgage loans for Massachusetts consumers.

As Radius Financial 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. Lending practices and products did not show an undue concentration or a systematic pattern of lending resulting in mortgage loans that were not sustainable. Overall, the mortgage lender provides an effective delivery of mortgage lending services throughout the Commonwealth.

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.

Radius Financial's President speaks semi-annually at the Plymouth and South Shore Association of Realtors Conference to inform realtors about the types flexible lending products available to Massachusetts consumers, most recently speaking about USDA Rural Housing loans and in past years on other loan products which assist low- and moderate-income borrowers and areas within the Commonwealth. In January 2014, as a member of the Woman's Presidents Organization (WPO), Radius Financial's president also spoke at a WPO Platinum Group Seminar on designing employee benefits which support and promote homeownership for female employees through specialized benefits programs such as down payment assistance offered at companies.

Senior management and loan officers participate in a number of financial literacy initiatives such as first time homebuyer (FTHB) and veterans administration (VA) seminars throughout the year. The members of the mortgage lender's staff dedicate time annually at the Braintree Senior Center to discuss financial planning, home purchases, estate planning and mortgages. During 2013, Radius Financial participated in an FTHB seminar in Norwood and at the Rotary Young Leaders Association with a presentation on financial literacy and homeownership.

Recently Radius Financial participated in five FTHB seminars in Plymouth, Medford and Waltham during the first half of 2014. Also in February 2014, Radius Financial held a seminar at the South Shore Chamber of Commerce on available affordable housing programs.

Radius Financial has shown its commitment to serving the military population of Massachusetts, not only through donations but also through educating veterans on the VA guaranteed loan program and the benefits of homeownership. Radius Financial staff participated in the Braintree VA Job and Homebuying Fair and at the Wellesley VA Minutemen Homebuying Fair held in 2013 and 2014, respectively.

Qualified Investments

A Qualified Investment for the purposes of this MLCI evaluation is a lawful investment, deposit, membership share, or grant that has as its primary purpose community development. The evaluation considers (1) the number of investments and grants, (2) the extent to which community development opportunities have been made available to the institution, and (3) the responsiveness of the institution's community development grants to the assessment area's needs.

In addition to the more than 15 financial literacy seminars conducted during the examination period, Radius Financial also made \$4,325 in donations to organization that meet the definition of Community Development. Examples of Radius Financial's Community Development contributions follow:

Radius Financial donated to the Mortgage Bankers Association (MBA) Open Doors Foundation, which, through the Mortgage and Rent Grant Assistance Initiatives, provides grants to parents and guardians with critically ill or injured children, allowing them to take unpaid leave from work and spend time with their children.

Multiple donations were made during the examination period to the Massachusetts Mortgage Bankers Association (MMBA) Scholarship Fund and the MMBA Foundation. The MMBA Scholarship Fund provided scholarships to low income students attending Bunker Hill Community College in Boston who are studying Accounting, Business, Economics and/or Finance. The MMBA Foundation awards grants to non-profit organizations that provide debt management education and which promote the quality and availability of affordable housing within the Commonwealth of Massachusetts.

In 2014 Radius Financial showed its commitment to providing safe, accessible housing for injured war veterans through donations to the Homes for our Troops Organization. The Massachusetts-based organization builds or renovates specially adapted homes for injured veterans. Radius Financial donated a dollar for every "like" on its Facebook page received through July 2014.

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.