

PUBLIC DISCLOSURE

October 22, 2014

**CRA FOR MORTGAGE LENDERS
PERFORMANCE EVALUATION**

**ENVOY MORTGAGE, LTD
MC 6666**

**5100 WESTHEIMER ROAD, SUITE 320
HOUSTON, TX 77056**

**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 **Envoy Mortgage, Ltd (Envoy Mortgage)** prepared by the Division, the mortgage lender's supervisory agency, as of **October 22, 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 Envoy Mortgage'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 Envoy Mortgage's community investment performance. These procedures utilize two performance tests: the Lending Test and the Service Test. This evaluation considered Envoy Mortgage's lending and community development activities for the period of January 1, 2012 through December 31, 2013. Lending data from the first three quarters of 2014 (YTD 2014) was also reviewed for trends. 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, 2013 and YTD 2014 is presented in the geographic distribution, lending to borrowers of different incomes and the Minority Application Flow tables. Home mortgage lending data for year to date 2014 is illustrated in the mortgage lenders data, however, the mortgage lender's 2013 performance is weighted more heavily for purposes of assigning a rating. Comparative analysis is provided for the mortgage lender's 2013 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 "Satisfactory."

- The distribution of borrowers reflects, given the demographics of Massachusetts, a good 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 a reasonable dispersion in low- and moderate-income census tracts as it is reflective of the distribution of owner occupied housing in those census tracts.
- Envoy Mortgage offers 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.
- Envoy Mortgage offered Community Development Services in the Commonwealth during the examination period.

PERFORMANCE CONTEXT

Description of Mortgage Lender

Envoy Mortgage was granted a mortgage lender license by the Division on December 31, 2009.

Envoy Mortgage's corporate office is located at 5100 Westheimer Road, Suite 320 in Houston, Texas. The mortgage lender opened in 2002 originally focused on the Texas market, however since 2008, has expanded its lending footprint by adding origination staff and branches throughout the country including six locations within New England, two of which are currently located in Andover and Worcester, Massachusetts. During the examination period the mortgage lender had four Massachusetts branch locations, which were closed in 2014.

Envoy Mortgage primarily conducts business as a retail lender via its nationwide branch network. All loans originated by Envoy Mortgage are secured by 1-4 family detached dwellings, townhomes, condominiums and other similar types of residential property. Envoy Mortgage is an approved HUD non-supervised lender with direct endorsement authority, as well as a VA and USDA approved lender. All loans are funded via access to multiple warehouse lines of credit and loans originated are primarily sold shortly after funding in the secondary market to large institutional investors as well as to FNMA.

In 2012, Envoy Mortgage began transferring loans that were previously being subserviced to its newly created in-house servicing operation. At this time, the mortgage lender began retaining servicing rights on certain loans sold to FNMA, as well as government loans pooled in GNMA securities. Additionally in 2013, Envoy Mortgage developed its Correspondent Lending Division which purchases closed loans from a variety of banks and non-bank mortgage lenders.

Demographic Information

Demographic data is provided below to offer contextual overviews of economic, 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 now 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 August 30, 2014 stood at 5.8 percent, which is a decrease from 7.0 percent in December 31, 2013, and 6.7 percent in December 31, 2012. 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

Envoy Mortgage's Lending Test performance was rated an overall "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 Envoy Mortgage.

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.

Envoy Mortgage achieved a good 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.

Distribution of HMDA Loans by Borrower Income						
Median Family Income Level	% of Families	2012 Envoy Mortgage		2013 Envoy Mortgage		2013 Aggregate Lending Data (% of #)
		#	%	#	%	
Low	19.3	35	9.5	19	6.5	5.4
Moderate	17.8	86	23.3	89	30.6	15.9
Middle	24.4	113	30.6	98	33.7	22.9
Upper	38.5	133	36.1	84	28.9	43.7
NA*	0.0	2	0.5	1	0.3	12.1
Total	100.0	369	100.0	291	100.0	100.0

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

As shown in the above table, Envoy Mortgage's 2013 lending to low-income borrowers was above aggregate lending and lending to moderate-income borrowers was well above at 30.6 percent, nearly twice that of aggregate lending. When compared to the percentage of families in each respective income group, both the mortgage lender and aggregate lending to low-income borrowers was also below the demographics; however Envoy Mortgage's lending to moderate-income borrowers was above the percentage of moderate-income families in the Commonwealth.

Envoy Mortgage's lending in the first three quarters of 2014 was analyzed for trends and revealed lending to low- and moderate-income borrowers at 8.7 and 28.6 percent respectively, was comparable or above previous years lending performances. Overall the mortgage lender's distribution of loans by borrower income is consistently above aggregate lending.

II Geographic Distribution

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

Envoy Mortgage's distribution of lending in the Commonwealth when compared to the demographics and aggregate lending data was reasonable. 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 Envoy Mortgage		2013 Envoy Mortgage		2013 Aggregate Lending Data (% of #)
		#	%	#	%	
Low	2.9	6	1.6	8	2.8	2.8
Moderate	13.7	39	10.6	35	12.0	12.3
Middle	48.9	199	53.9	161	55.3	46.1
Upper	34.5	125	33.9	87	29.9	38.8
Total	100.0	369	100.0	291	100.0	100.0

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

In 2013, Envoy Mortgage's lending performance in low- and moderate-income census tracts was comparable to aggregate lending data, and was slightly below the percentage of owner-occupied housing units in these tracts. Although the overall lending volume decreased from 2012 to 2013 due to the generally increasing interest rate environment, the mortgage lender's percentage of loans in low- and moderate-income census tracts increased during that time. The increasing trend of lending in these tracts, continued through the first nine months of 2014. Lending data analyzed for 2014 showed a continued increase in the percentage of lending in low- and moderate-income tracts at 4.4 and 13.7 percent respectively.

III. Innovative or Flexible Lending Practices

Envoy Mortgage 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.

Envoy Mortgage offers Federal Housing Administration (FHA) insured mortgages, as well as Veterans Association (VA) and United States Department of Agriculture (USDA) guaranteed mortgage loans. Envoy Mortgage is an approved HUD non-supervised mortgage lender with Direct Endorsement Authority, a VA Automatic Lender with LAPP Approval, and is an approved USDA Lender. The FHA, VA and USDA products offered by Envoy Mortgage provide competitive interest rates and smaller down payments for low- and moderate-income first-time homebuyers and existing homeowners. Envoy Mortgage is currently in the process of becoming approved with MassHousing to expand the products offered to Massachusetts consumers.

During the review period of 2012, 2013 and the YTD 2014, Envoy Mortgage originated 180 FHA loans totaling \$41.6 million. Of the 180 FHA loans closed during the examination period, 83 were originated to low- or moderate-income borrowers and 23 benefited low- and moderate-income geographies within the Commonwealth. FHA products offered include the FHA 203k Rehabilitation Loan Program which is HUD's primary program for the rehabilitation and repair of single family properties.

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 the examination period Envoy Mortgage originated 17 VA loans totaling \$4.4 million. Of these, 7 loans were originated to low- and moderate-income level consumers and 5 were originated in low- and moderate-income geographies.

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. Envoy Mortgage originated 32 USDA loans totaling \$6.1 million during the examination period of which all were originated to either low- or moderate-income borrowers.

Flexible loan programs are an important tool for community and neighborhood revitalization and show Envoy Mortgage'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.

Envoy Mortgage 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 a variety of online and in-house training courses which all employees including management are required to take annually. All employees are provided with training in fair lending issues appropriate to their job description and responsibilities. All loans are monitored for compliance, by monthly quality control audits which review samples of loan files pre- and post-closing. Envoy Mortgage conducts quarterly internal reviews of fair lending practices which include an analysis of lending data, complaints and denials. The mortgage lender also contracts with an outside auditor to conduct annual external fair lending audits. In addition all denied loans receive a secondary review before a final decision is made.

MINORITY APPLICATION FLOW

During 2012 and 2013, Envoy Mortgage received 901 HMDA-reportable loan applications from within the Commonwealth of Massachusetts. Of these applications, 60 or 6.7 percent were received from minority applicants. Envoy Mortgage received 52 or 5.8 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 9.59 percent Hispanic or Latino. Racial minorities consisted of 5.98 percent Black; 5.33 percent 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. 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 Envoy Mortgage		2013 Envoy Mortgage		2013 Aggregate Data
	#	%	#	%	%
<i>American Indian/ Alaska Native</i>	0	0.0	0	0.0	0.2
<i>Asian</i>	13	2.7	12	2.8	4.8
<i>Black/ African American</i>	10	2.1	23	5.5	2.4
<i>Hawaiian/Pac Isl.</i>	0	0.0	0	0.0	0.1
<i>2 or more Minority</i>	0	0.0	0	0.0	0.0
<i>Joint Race (White/Minority)</i>	0	0.0	2	0.5	1.2
Total Minority	23	4.8	37	8.8	8.7
<i>White</i>	443	92.5	374	88.6	69.5
<i>Race Not Available</i>	13	2.7	11	2.6	21.8
Total	479	100.0	422	100.0	100.0
ETHNICITY					
<i>Hispanic or Latino</i>	20	4.2	23	5.4	2.8
<i>Not Hispanic or Latino</i>	441	92.1	384	91.0	74.7
<i>Joint (Hisp/Lat /Not Hisp/Lat)</i>	4	0.8	5	1.2	0.9
<i>Ethnicity Not Available</i>	14	2.9	10	2.4	21.6
Total	479	100.0	422	100.0	100.0

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

In 2013, Envoy Mortgage's performance was comparable to the aggregate's performance for racial minorities and above for ethnic minority applicants at 8.8 and 6.6 percent respectively.

V. Loss of Affordable Housing

This review concentrated on the suitability and sustainability of mortgage loans originated by Envoy Mortgage 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.

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

Mortgage Lending Services

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.

Envoy Mortgage provides an adequate 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. Envoy Mortgage generates applications through their retail business. Loans are marketed through the internet, telephone solicitations, direct mail and through realtor relationships. Massachusetts consumers can apply to Envoy Mortgage for a mortgage online or with a loan officer at a branch or by phone. Massachusetts branch locations include 2 Steven Street in Andover, located in a middle-income tract; and 418 Main Street in Worcester, located in a low-income tract. The mortgage lender also has three New Hampshire branches and one Rhode Island branch which are licensed to service Massachusetts consumers. During the examination period, Envoy Mortgage closed two branches located in Plymouth and Stoughton, Massachusetts, both located in middle income tracts.

Through Envoy Mortgage's website, www.envoymortgage.com, consumers can apply online and manage their existing mortgage accounts, including pay online. The website also offers a resource center with information on home ownership, mortgage loan products and loan modification assistance.

Envoy Mortgage has a servicing department, which services all loans for which the mortgage lender holds servicing rights, and handles the interim servicing of loans that are sold on the secondary market. In addition to the general servicing of mortgage loan accounts, the Envoy Mortgage also offers a number of options for borrowers who are experiencing temporary or permanent financial hardship. Envoy Mortgage follows a workout hierarchy which includes temporary forbearances which delay foreclosures (a 30 to 60 day grace period which allows consumers to bring the mortgage current), mortgage repayment plans, modifications, short sales and deeds-in-lieu, and works with borrowers to pursue the best option. Envoy Mortgage participates in loss mitigation programs offered by FNMA, FHLMC, FHA, VA, and USDA. In correspondence sent to borrowers, the mortgage lender provides contact information for Homeownership Preservation Foundation, a nonprofit organization dedicated to guiding consumers onto the path of homeownership and improving their financial health, as well as information on the Massachusetts Division of Banks' foreclosure prevention. Envoy Mortgage's collection and loss mitigation strategies focus on home retention and alternatives to foreclosure, while complying with all applicable state and federal statutes, laws, and regulations.

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..

At present, Envoy Mortgage does not engage in any such activities.

Qualified Investments

A Qualified Investment for the purposes of this CRA 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.

Envoy made \$4,400 in qualified donations during the examination period which went to organizations that promote education, youth programs, health and human services for individuals in need, and economic development throughout the Commonwealth of Massachusetts. Charitable recipients included:

The Wounded Warrior Project is a nonprofit veteran's service organization that offers a variety of programs and services to wounded veterans. The organization raises awareness and enlists the public's aid for the needs of severely injured service men and women, and provides direct programs and services to meet their needs.

The American Red Cross provides service including disaster relief, support for American military families, health and human services as well as international services.

Massachusetts Fallen Heroes organization assists in acquiring educational, employment, medical, legal, financial and numerous additional services to local military veterans, their families and families of the fallen. The organization partners with a network of Massachusetts civilian organizations, Veterans organizations, non-profits, and private corporations who donate their professional services to assist in the process of providing local Veterans and their families with specialized assistance.

Worcester State Foundation is a nonprofit organization which administers a variety of scholarship programs to students of Worcester State University, the majority of which are need based scholarships.

Saint Spyridon Greek Orthodox Cathedral – Annual contributions made through a sponsorship golf tournament benefits the church's ministries, which include a food bank, youth and senior programs. An Envoy Mortgage loan officer is on the committee that organizes charitable events at the church located in a moderate-income tract in Worcester.

In addition to contributions made within Massachusetts, Envoy Mortgage made contributions totaling \$25,000 which benefited state or national organizations whose primary focus is community development and which represent the mortgage lender's national footprint.

Charitable recipients included Habitat for Humanity, Marine Toys for Tots Foundation and ReBuild Globally.

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.