

PUBLIC DISCLOSURE

MARCH 2, 2010

**MORTGAGE LENDER COMMUNITY INVESTMENT
PERFORMANCE EVALUATION**

**PULTE MORTGAGE, LLC.
MC1014**

**7390 SOUTH IOLA STREET
ENGLEWOOD, CO 80112**

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

<p>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.</p>
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GENERAL INFORMATION

Massachusetts General Laws chapter 255E, section 8 and the Division of Banks' ("Division") regulation 209 CMR 54.00, Mortgage Lender Community Investment ("MLCI"), 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 MLCI performance of **Pulte Mortgage, LLC. (or "Pulte")** prepared by the Division, the mortgage lender's supervisory agency, as of **March 2, 2010**.

SCOPE OF EXAMINATION

An onsite evaluation was conducted using examination procedures, as defined by MLCI. A review of the Division's records, as well as the mortgage lender's public MLCI file, did not reveal any complaints relating to Pulte Mortgage LLC MLCI performance.

The MLCI examination included a comprehensive review and analysis, as applicable, of Pulte'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.

MLCI examination procedures were used to evaluate Pulte's community investment performance. These procedures utilize two performance tests: the Lending Test and the Service Test. This evaluation considered Pulte's lending and community development activities for the period of January 2008 through December 2009. 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 income, innovative and flexible lending practices, fair lending, and loss of affordable housing.

The MLCI evaluation includes an analysis of the mortgage loans reportable under the Home Mortgage Disclosure Act (“HMDA”) for 2008 and 2009. The residential loan data was obtained from the Loan Application Registers (“LAR”) maintained by Pulte pursuant to HMDA.

Home mortgage lending for 2008 and 2009 is presented in the following tables: geographic distribution, lending to borrowers of different incomes and the minority application flow. Comparative analysis is provided for the mortgage lender’s 2008 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 HMDA reporting lenders which originated loans in Massachusetts. Home mortgage lending data for 2009 is referenced in the narrative to illustrate trends in Pulte’s lending data.

In addition to gathering and evaluating statistical information relative to a mortgage lender’s loan volume, the MLCI 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 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 MLCI RATING: This mortgage Lender is rated "Satisfactory."

This "Satisfactory" rating is based upon:

- The geographic distribution of the Lender's loans reflects a marginally adequate dispersion of loans in the Commonwealth given mitigating circumstances.
- The distribution of borrowers reflects, given the demographics of Massachusetts, an adequate record of serving the credit needs among individuals of different income levels, including low and moderate-income.
- Pulte Mortgage offers an adequate number of flexible lending programs to the customers it serves, and these products are provided in a safe and sound manner.
- The mortgage lender has a limited number of Community Development services.
- Fair lending policies and practices are considered reasonable. No complaints were received by the mortgage lender during the evaluation period.

PERFORMANCE CONTEXT

Description of Mortgage Lender

Pulte Mortgage LLC is a Colorado corporation organized in 1972 and operates as a mortgage lender and mortgage broker in Massachusetts. The lender is a wholly-owned subsidiary company of Pulte Home Corporation (PHC) and the indirect parent company of Pulte Mortgage LLC is Pulte Homes, Inc. (PHM).

PHM is one of the nation's largest residential homebuilders based on number of units sold. PHM has been in business for over 50 years and has continued to expand its domestic homebuilding operations, most recently through a merger with Centex Corporation (Centex) in August, 2009. PHM's headquarters are in Bloomfield Hills, Michigan. The corporate and operational headquarters for Pulte Mortgage LLC is located in Englewood, Colorado. Pulte Mortgage LLC currently operates in 28 states and the District of Columbia providing home financing for purchasers of Pulte, Del Webb, DiVosta and Centex homes.

Pulte Mortgage LLC's principal business is purchase money loans. Pulte Mortgage LLC investor offerings include FHA, VA, Fannie Mae, Freddie Mac and non-agency loans. Product offerings include first mortgages and second mortgages. Pulte Mortgage LLC is currently capturing approximately 90% of PHM's eligible business. Pulte Mortgage LLC's loan production volume for 2009 was \$1.8 billion, and is expected to be \$2.6 billion in 2010.

PHM's homebuilding affiliates employ the sales force that sells Pulte and Centex homes. Pulte Mortgage LLC offers financing to PHM and Centex customers. Pulte Mortgage LLC performs all operational functions including origination, processing, closing and underwriting in one centralized site (Operations). States are served by geographical teams consisting of loan consultants, underwriters, processors and closers.

Demographic Information

The MLCI 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 the economic climate along with housing and population characteristics for the Commonwealth of Massachusetts.

DEMOGRAPHIC INFORMATION*						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	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		\$209,519	
2007 HUD Adjusted Median Family Income		\$76,075	Unemployment Rate		9.5%**	
Households Below Poverty Level		9.8%				

*Source: PCI Corporation Inc., CRA Wiz, Data Source: 2000 US Census

**as of January, 2010.

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 are vacant units.

Low-income is defined as individual income less than 50 percent of the area median income. Moderate-income is defined as individual income which 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.

There are 2.4 million households in the Commonwealth with a median household income of \$53,686 according to the 2000 Census. Over 40 percent of these households are classified as low and moderate-income. In addition, 9.8 percent of the total numbers 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" total slightly over 1.5 million. Of all family households, 20.5 percent are low-income, 17.7 percent are moderate-income, 23.3 percent are middle-income, and 39.5 percent are upper-income. The median family income according to the 2000 Census was \$65,318. The Housing and Urban Development (HUD) adjusted median family income is \$76,075. The adjusted median family income is updated yearly and takes into account inflation and other economic events.

The Commonwealth of Massachusetts contains 1,361 Census tracts. Of these, 114 or 8.4 percent are low-income; 295 or 21.7 percent are moderate-income; 628 or 46.1 percent are middle-income; 319 or 23.4 percent are upper-income; and 5 or 0.4 are NA or have no income designation. The five Census tracts with no income designation are located in Bridgewater (a correctional facility), Boston (islands in Boston Harbor), Amherst (University of Massachusetts campus), Harvard (Fort Devens), and Grafton (Tufts Veterinary School). These Census tracts contain no housing units and will not be included in this evaluation since they provide no lending opportunities.

The median housing value for Massachusetts was \$209,519 according to the 2000 Census. However, recent figures from the Warren Group, publishers of Banker's and Tradesman, show the median price for a single-family dropped 11.6 percent from \$345,000 in 2007 to \$305,000 in 2008. Fluctuating housing values have a direct effect in mortgage affordability and the types of financial products adequate for homeowners and property buyers.

The unemployment rate for the Massachusetts as of January 2010 was 9.5% up from 7.7% in February 2009. This represents an increase from the end of 2008 when the unemployment rate stood at 6.4 percent. Employment rates would tend to affect a borrower's ability to remain current on mortgage loan obligations and correlates to delinquency and default rates.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Pulte's Lending Test performance was rated an overall "Satisfactory" 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 Pulte Mortgage, LLC.

I. Geographic Distribution

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

The mortgage lender's geographic distribution of loans reflects a disparity from the performance of the aggregate's distribution of loans in the Commonwealth and the distribution of owner-occupied housing units in low-, moderate- and upper-income census tracts. This variation is explained because the lender finances the majority of the properties sold by Pulte Homes, Inc., the lender's parent company. In 2008 and 2009, PHM had developments in the Massachusetts communities of Acton, Danvers, Plymouth, Stow, Upton and Waltham and none of the developments were located in low- or moderate-income Census tracts.

The following table presents Pulte Mortgage, LLC's HMDA-reportable loans by Census tract income as well as the 2008 aggregate data (exclusive of Pulte). In addition, the table also reflects the percentage of owner-occupied housing units in each of the census tract income categories.

Distribution of HMDA Loans by Income Category of the Census Tract								
Census Tract Income Level	% Total Owner-Occupied Housing Units	PULTE 2008		Aggregate Lending Data 2008 (% of #)	PULTE 2009		PULTE Total	
		#	%		#	%	#	%
Low	1.6	0	0.0	2.2	0	0.0	0	0.0
Moderate	12.8	0	0.0	14.1	0	0.0	0	0.0
Middle	54.0	64	52.0	52.0	56	71.8	120	59.8
Upper	31.6	59	48.0	31.7	22	28.2	81	40.2
Total	100.0	123	100.0	100.0	78	100.0	201	100.0

Source: 2008 and 2009 HMDA Data and 2000 U.S. Census

As reflected in the table above, the concentration of residential loan originations is in the middle- and upper-income census tracts. This would be expected due to the fact that the majority of Pulte's is driven by the location of PHM's developments, which are presently located exclusively in middle- and upper-income Census tracts.

Overall, the geographic distribution of loans reflects marginally adequate performance given the mitigating circumstances.

II. 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.

Pulte achieved a good record of serving the mortgage credit needs among borrowers of different income levels based on the areas' demographics and a comparison to aggregate lending data in Massachusetts.

The following table shows 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	% Families	PULTE 2008		Aggregate Lending Data 2008 (% of #)	PULTE 2009		PULTE Total	
		#	%		#	%	#	%
Low	20.5	11	8.9	5.0	3	3.9	14	7.0
Moderate	17.7	16	13.0	16.9	14	18.0	30	14.9
Middle	22.3	23	18.7	23.9	26	33.3	49	24.4
Upper	39.5	73	59.4	37.8	35	44.8	108	53.7
NA*	0.0	0	0.0	16.4	0	0.0	0	0.0
Total	100.0	123	100.0	100.0	78	100.0	201	100.0

Source: 2008 and 2009 HMDA Data and 2000 U.S. Census *Income Not Available

In 2008, lending to low-income borrowers at 8.9 percent exceeded the performance of the aggregate at 5.0 percent. The percentage of low-income families was at 20.5 percent; however, as noted previously, 9.8 of all households are below the poverty level. The performance of lending to low-income borrowers is notable.

Lending to moderate-income borrowers was lower than the performance of the aggregate and percentage of families in that income designation in 2008 but showed an increase in 2009. Although aggregate information is not available, this is a significant positive trend that offset the decline of loans to low-income borrowers.

The distribution of loans by borrower income reflects good performance.

III. Innovative or Flexible Lending Practices

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

Pulte Mortgage, LLC offers a 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 or geographies.

Pulte has access to flexible lending products through in-house offerings and through its broker channel.

Pulte is directly endorsed by the US Department of Housing and Urban Development to underwrite Federal Housing Administration (FHA) insured loans and is designated by the Veteran Administration (VA) as an Automatic Lender to underwrite VA guaranteed loans. The variety of FHA and VA products offered by Pulte provides competitive interest rates and smaller down payments for low- and moderate-income first time homebuyers and existing homeowners.

In 2008, Pulte closed 1 FHA loan totaling \$296,748. In 2009, the number of loans increased to 5 totaling \$1,360,674.

IV. Fair Lending

The Division examines a mortgage lender's fair lending policies and procedures pursuant to Regulatory Bulletin 1.3-103 and Regulatory Bulletin 5.3-101. 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.

Pulte has established an adequate record relative to fair lending policies and practices. The Lender has written policies and procedures which outline the procedural and operational steps taken to prevent disparate treatment.

Pulte Mortgage, LLC delivers training materials, which include fair lending, to its employees using a wide variety of methods but not limited to instructor-led classroom training, webinar training, and on-line tutorials. Training provided to employees is reinforced by written policies, compliance manuals and standard operating procedures. New hire employees are required to attend an orientation training program which contains cultural, customer service, systems, policies, procedures, regulatory and compliance information. Further, supplemental training is provided to relevant employees to ensure they are educated on-going to the changes in the industry or the needs of the organization.

Employee training for state licensing, including pre-licensing education and continuing education is provided by an approved third-party vendor. This third party vendor conducts Mortgage Loan Originator licensing education to meet federal and state licensing requirements.

Pulte has established a rejected loan audit which is conducted on a monthly basis. This audit is done with the use of an auditing software system which enables the lender to import all rejected loans. The software system automatically selects a certain percentage of files for complete review. The emphasis of the rejected loan audit is to review underwriting and compliance with fair lending requirements and proper HMDA reporting.

Pulte has also established a second review process which is conducted by an additional underwriter prior to notifying the applicant the request is declined. Further, the lender has developed similar software for the use of pre-funding and post-funding audits. These audits were designed to assess compliance risk based on federal and state regulations, investor requirements and Pulte's policies.

Upon conclusion of the Fair Lending review, the Division's examination found no evidence of disparate treatment.

MINORITY APPLICATION FLOW

For 2008 and 2009, Pulte received 329 HMDA-reportable loan applications from within the Commonwealth of Massachusetts. Of these applications, 104 or 31.6 percent were received from minority applicants, of which 61 or 58.7 percent resulted in originations. Pulte received 6 or 1.8 percent of HMDA-reportable applications from ethnic groups of Hispanic origin within its assessment area of which 5 or 83.3 percent were originated.

The minority population in the Commonwealth is at 18.1 percent. Pulte's level of applications was compared with that of the aggregate's performance levels for the most recent year that data was available, the year 2008, and the area's demographics. The lender received a total of 35.0 percent of its applications from racial minorities which was significantly higher than the aggregate at 8.4 percent. The lender also received 1.0 percent of its applications from ethnic minorities, falling below the aggregate at 4.7 percent.

Refer to the following table for information on the mortgage lender's minority application flow as well as a comparison of the aggregate Lenders throughout the Commonwealth of Massachusetts.

MINORITY APPLICATION FLOW								
RACE	Pulte 2008		2008 Aggregate Data		Pulte 2009		Total Pulte	
	#	%	#	%	#	%	#	%
<i>American Indian/Alaska Native</i>	0	0.0	690	0.1	1	0.9	1	0.3
<i>Asian</i>	67	30.9	11,738	3.5	25	22.3	92	28.0
<i>Black/ African American</i>	4	1.8	11,751	3.5	2	1.8	6	1.8
<i>Hawaiian/Pac Isl.</i>	1	0.5	640	0.2	0	0.0	1	0.3
<i>2 or more Minority</i>	0	0.0	280	0.1	0	0.0	0	0.0
<i>Joint Race (White/Minority)</i>	4	1.8	3,197	1.0	0	0.0	4	1.2
Total Minority	76	35.0	28,296	8.4	28	25.0	104	31.6
<i>White</i>	116	53.5	234,287	69.6	69	61.6	185	56.2
<i>Race Not Available</i>	25	11.5	73,883	22.0	15	13.4	40	12.2
Total	217	100.0	336,466	100.0	112	100.0	329	100.0
ETHNICITY								
<i>Hispanic or Latino</i>	1	0.5	13,252	3.9	2	1.8	3	0.9
<i>Not Hispanic or Latino</i>	196	90.3	246,372	73.2	92	82.1	288	87.5
<i>Joint (Hisp/Lat /Not Hisp/Lat)</i>	1	0.5	2,643	0.8	2	1.8	3	0.9
<i>Ethnicity Not Available</i>	19	8.7	74,199	22.1	16	14.3	35	10.7
Total	217	100.0	336,466	100.0	112	100.0	329	100.0

V. Loss of Affordable Housing

This review concentrated on the suitability and sustainability of mortgage loans originated by Pulte 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 with an undue concentration or 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 and better in some instances.

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. In accordance with the Division's regulation 209 CMR 54.23(2), "[c]ommunity development services must benefit the Commonwealth or a broader regional area that includes the Commonwealth."

Pulte's performance was determined to be rated "Needs to Improve" under its Service Test because its community development services within Massachusetts were minimal. More emphasis in local community development activities is recommended.

Mortgage Lending Services

The Commissioner evaluates the availability and effectiveness of a mortgage lender's systems for delivering mortgage lending services, pursuant to the following criteria:

- (a) the availability and effectiveness of systems for delivering mortgage lending services (e.g., Internet, telephone solicitation, direct mail) in low- and moderate-income geographies and to low- and moderate-income individuals, including, to the extent applicable, the current distribution of the mortgage Lender's branches among low-, moderate-, middle-, and upper-income geographies;
- (b) efforts to work with delinquent home mortgage loan borrowers to facilitate a resolution of the delinquency, including the number of loan modifications, the timeliness of such modifications, and the extent to which such modifications are effective in preventing subsequent defaults or foreclosures; and
- (c) the range of services provided in low-, moderate-, middle-, and upper- income geographies and the degree to which the services are tailored to meet the needs of those geographies.

Pulte generates the majority of its business from referrals received from PHM, its parent company. The majority of loan applications are received through the lender's website which allows customers to view loan products available and to apply online. It also offers an education to the applicant that illustrates the pros and cons of the different loan types offered. The website also has a glossary of common mortgage terms and a payment calculator. Pulte provides an effective delivery of services that are accessible to geographies and individuals of different income levels in the Commonwealth.

Pulte Mortgage, LLC is a centralized lender located in Englewood, Colorado. All Massachusetts loans are originated, underwritten, processed, and closed at this centralized location. Pulte does maintain one Massachusetts branch located at 115 Flanders Road, Suite 200 Westborough. This Branch location provides support services to Massachusetts customers on an as needed basis. No loans are originated, underwritten, processed or closed at this location.

Pulte does not routinely service mortgage loans. However, it does service loans that were not sold in the secondary market and loans that had to be re-purchased. This small portfolio of loans is serviced until an existing deficiency can be cured and the loan can be sold in the secondary market.

Pulte has developed a loan default policy which outlines steps that can be taken by the lender's loss mitigation department. This policy allows for payment plans, forbearance agreements modifications and short sales, and will accept a deed-in-lieu of foreclosure from borrowers depending on the individual circumstance and/or situation. It should be noted, in 2008 and 2009, Pulte did not modify or restructure any Massachusetts loans originating from its servicing portfolio. However, in 2008, two short sales were accepted. Pulte's 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

Community development means:

- (a) Mortgage products and other efforts to assist low- and moderate-income individuals to acquire or remain in affordable housing;
- (b) community services targeted to low- and moderate-income individuals;
- (c) Activities that revitalize or stabilize -
 - (1) Low- or moderate-income geographies;
 - (2) Designated disaster areas; or
 - (3) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the Office of the Comptroller of the Currency; or
 - (4) Any other such area as determined by the Commissioner based on -
 - (A) Rates of poverty, unemployment, and population loss; or
 - (B) Population size, density, and dispersion. Activities revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community and economic development needs, including needs of low- and moderate-income individuals.

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.

Pulte's community development services are geared to members of the public that are interested in a Pulte Homes property.

Pulte has developed two main educational programs, the Easy Move Workshop and informal workshops for potential Housing Lottery consumers for the builders Affordable Dwellings Units (AUDs). The Easy Move Workshops are geared to consumers over 55 and are designed to update and educate consumers on the current strategies for marketing homes and the changes in the mortgage market. The second types of workshops are general information sessions presented to potential housing lottery participants for the builder's AUDs. The content covers information about the community, the lottery program and information on financing options. Pulte conducted two seminars in 2008, four in 2009 and one in 2010.

Qualified Investments

A qualified investment is a lawful investment, deposit, membership share, or grant having as its primary purpose community development.

Pulte Mortgage does not currently engage in any qualified community development investments.

Additional focus and commitment by Pulte Mortgage should be employed by taking a strong leadership role in other community development activities. Other activities may include, but not necessarily be limited to: financial literacy education initiatives targeted to low and moderate-income individuals; and foreclosure prevention counseling and/or technical assistance to community organizations implementing such programs.

PERFORMANCE EVALUATION DISCLOSURE GUIDE

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

- 1) Make its most current MLCI performance evaluation available to the public;
- 2) Provide a copy of its current evaluation to the public, upon request. In connection with this, 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 its supervisory agency, may not be altered or abridged in any manner. The mortgage lender is encouraged to include its response to the evaluation in its MLCI 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.