



LARGE BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

FirstMerit Bank, National Association
Charter Number: 14579

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Akron, OH 44308

Office of the Comptroller of the Currency

Midsized Banks
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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

OVERALL CRA RATING	1
DEFINITIONS AND COMMON ABBREVIATIONS.....	2
DESCRIPTION OF INSTITUTION.....	6
SCOPE OF THE EVALUATION.....	7
FAIR LENDING REVIEW.....	8
STATE RATINGS.....	9
STATE OF OHIO.....	9
STATE OF PENNSYLVANIA.....	33
APPENDIX A: SCOPE OF EXAMINATION.....	A-1
APPENDIX B: SUMMARY OF STATE RATINGS.....	B-1
APPENDIX C: MARKET PROFILES FOR FULL-SCOPE AREAS.....	C-1
APPENDIX D: TABLES OF PERFORMANCE DATA.....	D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of **FirstMerit Bank, N.A.** with respect to the Lending, Investment, and Service Tests:

Performance Levels	FirstMerit Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The geographic distribution of lending is good in both Ohio and Pennsylvania. A substantial majority of loans are made within the bank's assessment areas.
- The distribution of loans among borrowers of different income levels is excellent in Ohio and good in Pennsylvania. Performance for home mortgage lending is excellent in each of FirstMerit's Ohio full-scope assessment areas, demonstrating a strong responsiveness to the housing needs of low- and moderate-income borrowers. The distribution of small loans to businesses is good in each full-scope assessment area.
- Community development lending activities and flexible lending practices have been effective in helping address the affordable housing needs of the community. They have a positive impact on Lending Test performance in Ohio.
- Qualified investment levels are adequate overall, and are good within the bank's Akron assessment area.
- FirstMerit's delivery systems provide good accessibility to the geographies and individuals of different income levels in Ohio and Pennsylvania. Community development service activity is also good.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

Geography: A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home Mortgage Loans: such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of

individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

FirstMerit Bank, National Association (FirstMerit) is a \$10.4 billion interstate bank headquartered in Akron, Ohio. FirstMerit has 156 banking offices throughout 21 counties in north and central Ohio and one county in western Pennsylvania. FirstMerit is a wholly owned subsidiary of FirstMerit Corporation, a \$10.5 billion holding company. FirstMerit Corporation subsidiaries include a credit life insurance company and a community development corporation. Bank subsidiaries provide mortgage lending, commercial leasing, retail brokerage, and insurance services. Except for the mortgage operation, subsidiary activities do not substantially impact FirstMerit's capacity for community reinvestment. At the request of the bank, we considered the activities of FirstMerit Mortgage Corporation and FirstMerit Corporation's investment in the FirstMerit Community Development Corporation in this evaluation. These affiliates increase FirstMerit's capacity to reinvest in the community through home mortgage lending, community development (CD) lending, qualified investment, and CD service activities.

FirstMerit offers a wide variety of retail and commercial banking products and services. The level of complexity and primary business lines are characteristic of a large community bank more so than a regional financial institution. While no merger activities occurred during this evaluation period, FirstMerit grew during the 1990's through merger and acquisition activities with other community banking organizations. FirstMerit's loan portfolio, totaling \$6.5 billion as of March 31, 2004, was 51 percent real estate, 24 percent commercial, and 25 percent consumer. Within the real estate segment, 51 percent of loans are residential and 49 percent are commercial. Commercial clients are primarily small and medium size businesses. FirstMerit is not an active agricultural lender. Tier 1 Capital was \$745.6 million. No financial or legal impediments hinder FirstMerit's ability to address community needs. However, high degrees of competition coupled with a limited branch presence in the City of Cleveland impact FirstMerit's ability to address the needs within the City of Cleveland. The last CRA evaluation was performed as of July 10, 2000.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is July 10, 2000 through May 17, 2004. We analyzed home mortgage lending data and CRA data (small loans to businesses and farms) from the period of January 1, 2000 through December 31, 2003. The review period for CD loans, qualified investments, and CD services is July 10, 2000 through May 17, 2004.

We performed analyses of Home Mortgage Disclosure Act (HMDA) and CRA data for 2000, 2001, and 2002 based on 1990 U.S. Census data. Analyses of 2003 HMDA and CRA data were performed based on 2000 U.S. Census data. This is consistent with the manner in which financial institutions were required to file data and consistent with the manner in which aggregate peer data was generated by the regulatory agencies. Accordingly, lending data from 2003 is presented in separate tables from the 2000 through 2002 data within appendix D. While 2002 peer data is included with the 2000-2002 tables, peer data for 2003 was not available. Geographic and borrower distribution conclusions under the Lending Test were drawn by blending the bank's record of lending under each of these time periods. Weightings were based on the relative number of loans under each time period for each product individually. Consequently, performance associated with the 1990 census data received greater weight.

Data Integrity

We tested the accuracy of FirstMerit's publicly filed information on home mortgage loans and small loans to businesses and farms. We also reviewed CD loans, qualified investments, and CD services to ensure that they meet the regulatory definition for CD. Substantial errors were identified within the small business data for years 2000, 2001, and 2002. The bank corrected the data and took steps to ensure the accuracy of 2003 data. Our subsequent testing confirmed that the data was corrected. This evaluation is based on corrected data.

Selection of Areas for Full-Scope Review

A sample of assessment areas (AAs) within each state that the bank has an office was selected for full-scope reviews. The Akron, Canton, and Cleveland AAs in Ohio, and the Lawrence County AA in Pennsylvania were selected for full-scope reviews. These areas represent FirstMerit's major markets in each state and account for more than 80 percent of the bank's deposits, reported loans, and branches. These areas also represent more than 77 percent of the population, owner-occupied housing units, and businesses within the bank's AAs in total. We assessed performance in the remaining four AAs through limited-scope procedures. Refer to the Scope of Evaluation under each State Rating section for details regarding how areas were selected for full-scope

reviews. Also refer to appendix A for additional information regarding which areas received full-scope and limited scope reviews.

Ratings

The bank's overall rating is a blend of the state ratings. Performance within the State of Ohio received dominant consideration as approximately 88 percent of deposits, 97 percent of branches, and 97 percent of lending activity is based in Ohio.

The state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" discussion under each State Rating section for details regarding how the areas were weighted in arriving at overall state ratings.

When drawing conclusions for the Lending Test in each AA, loan products were generally weighted according to their relative volume within that AA. This approach provided consideration to the bank's varied presence within the individual AAs. Using this approach, we gave greater weight to the bank's home mortgage lending than small business lending.

Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices.

State Rating

State of Ohio

CRA Rating for Ohio:	<u>Satisfactory</u>
The lending test is rated:	<u>Outstanding</u>
The investment test is rated:	<u>Low Satisfactory</u>
The service test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- The volume of lending activity is good. The geographic distribution of lending is also good. A substantial majority of loans are made within the bank's assessment areas.
- The distribution of loans among borrowers of different income levels is excellent. Performance for home mortgage lending is excellent in each of FirstMerit's full-scope assessment areas, demonstrating a strong responsiveness to the housing needs of low- and moderate-income borrowers. The distribution of small loans to businesses is good in each full-scope assessment area.
- Community development lending activities and flexible lending practices have a positive impact on Lending Test performance.
- Qualified investment levels are adequate overall, and are good within the bank's Akron market.
- The accessibility of FirstMerit's delivery systems to the geographies and individuals of different income levels is good. Community development service activity is also good.

Description of Institution's Operations in Ohio

FirstMerit provides a full range of residential, consumer, and commercial financial products and services in northeast and central Ohio. A substantial majority of the bank's deposits (88 percent), branches (97 percent), and reported loans (97 percent) are in Ohio. FirstMerit operates 152 branches and 166 ATMs within the state. With deposits totaling \$6.9 billion and a market share of 3.3 percent of insured deposits, FirstMerit is the ninth largest bank in the state. Competition is strong among financial service providers in all primary markets that FirstMerit operates in. FirstMerit competes with a large number of other financial institutions, including large regional banks and local community institutions.

FirstMerit has seven AAs in Ohio. Located primarily in metropolitan areas of northeast and central Ohio, the AAs consist of the entire Akron MSA (Akron); a portion of the Canton-Massillon MSA (Canton); the entire Cleveland-Elyria-Lorain MSA (Cleveland); the entire Mansfield MSA (Mansfield); a small portion of the Columbus MSA (Columbus); a small portion of the Toledo MSA (Toledo); and a contiguous group of non-metropolitan counties consisting of Ashland, Erie, Huron, Knox, Seneca, and Wayne Counties (non-metropolitan). The bank's primary operations are centered in the Akron, Canton, and Cleveland AAs. Please refer to the market profiles for the state of Ohio in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Ohio

The Akron, Canton, and Cleveland AAs were selected for full-scope reviews in Ohio. These AAs represent FirstMerit's major markets and account for approximately 87 percent of its Ohio deposits and 80 percent of reported loans for the evaluation period. Limited-scope reviews were performed for the Columbus, Mansfield, Toledo, and non-metropolitan AAs. Please refer to appendix A for additional information regarding which areas received full- and limited-scope reviews.

The Ohio ratings are based primarily on conclusions reached for FirstMerit's performance in the three full-scope AAs. The AAs are generally weighed in accordance to the number of reportable loans and level of deposits associated with each area. Some additional weight is placed on the Akron AA as it is the bank's headquarters market where FirstMerit is ranked number one in deposits. Therefore, performance in the Akron and Cleveland AAs is weighed more heavily than the Canton AA.

In drawing conclusions relative to the bank's performance in the full-scope AAs, we took into consideration information derived from members of the community. We contacted four organizations within the Akron AA, two organizations with the Canton AA, and three organizations within the Cleveland AA. We also considered previous information obtained through contacts made within the past year as well. Refer to the Market Profiles in appendix C for more information regarding community contacts performed during our full-scope analyses.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Ohio is rated "Outstanding." Based on full-scope reviews, the bank's performance in the Akron and Cleveland AAs is excellent, and performance in the Canton AA is good.

Lending Activity

Refer to Tables 1 Lending Volume for Ohio in appendix D for the facts and data used to evaluate the bank's lending activity.

FirstMerit's lending activity is good in the Akron, Canton, and Cleveland full-scope AAs.

FirstMerit's lending activity in the Akron AA is commensurate with its share of the deposit market, especially considering the large number of lenders operating in the area. FirstMerit ranks first in deposits among depository institutions with a 24 percent share of the market. According to 2002 aggregate HMDA data, FirstMerit is ranked eighth in volume of originated/purchased home purchase loans with a three percent market share, and fourth in volume of home mortgage refinance loans with a four percent market share. Only large national and regional lenders have had greater levels of activity, and less than five percentage points separate the top eight lenders. FirstMerit is the leading home improvement lender with an 18 percent market share. According to small business aggregate data for 2002, FirstMerit is ranked fifth in volume of small loans to businesses with a six percent market share. Three national lenders with no branches in the area dominate the small business lending data with a combined 48 percent of the market, and all three have average loan sizes of \$5,000 or less. In terms of small business loan dollars, FirstMerit is the market leader with a 28 percent market share.

FirstMerit's lending activity in the Canton AA is commensurate with its share of the deposit market. FirstMerit ranks first in deposits among depository institutions with a 24 percent share of the market. According to 2002 aggregate HMDA data, FirstMerit is ranked third in volume of both originated/purchased home purchase loans and home mortgage refinance loans with a 6 percent market share in each product line. Less than five percentage points separate the top five lenders. FirstMerit is the leading home improvement lender with a 21 percent market share. According to small business aggregate data for 2002, FirstMerit is ranked seventh in volume of small loans to businesses with a 5 percent market share. Five national lenders with no branches in the area dominate the small business lending data with 62 percent of the market combined, and all five have an average loan size less than ten thousand dollars. In terms of small business loan dollars, FirstMerit is the market leader with a 27 percent market share.

FirstMerit's lending activity in the Cleveland AA is commensurate with its share of the deposit market, especially considering the large number of lenders operating in the area. FirstMerit ranks seventh in terms of deposits among depository institutions with a four percent share of the market. According to 2002 aggregate HMDA data, FirstMerit is ranked seventeenth in volume of originated/purchased home purchase loans with a market share less than 2 percent. FirstMerit is tenth in volume of home mortgage refinance loans with a 3 percent market share. Only large national and regional lenders have had greater volume, all with market shares of less than 10 percent. FirstMerit is ranked fourth in home improvement lending with nearly nine percent of the market. The top three home improvement lenders are large local regional banking companies. According to small business aggregate data for 2002, FirstMerit is ranked eleventh in volume of small loans to businesses with a 3 percent market share. Six national lenders with no branches in the area dominate the small business lending data with over 65 percent of the market combined. In terms of small business loan dollars, FirstMerit is the market leader with a 15 percent market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution of FirstMerit's loans is good. This is based on excellent home mortgage and small business distributions in the Akron AA; adequate home mortgage and good small business distributions in the Canton AA; adequate distributions of home mortgage and small business loans in the Cleveland AA; and the fact that a substantial majority of FirstMerit's reported loans are from the bank's AAs. Based on volume, home mortgage lending performance is weighed greater than small business lending. The volume of small loans to farms was too small to perform a meaningful analysis.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 for the state of Ohio in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Akron Assessment Area

The geographic distribution of home purchase loans is good. The percentages of loans in low-income and moderate-income geographies are near to the percentages of owner-occupied housing units that are located in those areas. While FirstMerit's 2002 market share in low-income areas was lower than its overall share of the home purchase activity in Akron, its share in the moderate-income areas significantly exceeded its overall share.

The geographic distribution of home improvement loans is excellent in Akron. The percentages of loans in low-income and moderate-income geographies significantly exceed the percentages of owner-occupied housing units in these geographies.

Furthermore, FirstMerit's 2002 market share for loans in moderate-income areas exceeded the bank's overall home improvement share of the market, while its share in low-income areas was lower.

FirstMerit's geographic distribution of home refinance loans is excellent. The percentage of loans in low-income geographies exceeded the percentage of owner-occupied housing units in those areas. The percentage of loans in moderate-income areas was near to the percentage of owner-occupied housing units located in moderate-income geographies. Furthermore, the bank's 2002 market share for loans in both low- and moderate-income areas significantly exceeded its overall share of the refinance market in Akron.

The geographic distribution of multifamily loans is excellent in Akron. The percentages of loans in low-income and moderate-income geographies exceeded the percentages of multifamily housing units located in those areas. Market share information was not meaningful in 2002 for FirstMerit.

Canton Assessment Area

The geographic distribution of home purchase loans is adequate. The percentage of loans in moderate-income geographies equals the percentage of owner-occupied housing units located in moderate-income areas. FirstMerit's market share of lending in moderate-income areas significantly exceeded its overall home purchase share in Canton. The percentage of loans in low-income geographies is significantly below the percentage of owner-occupied housing units located in those areas. Likewise, FirstMerit's 2002 market share in the low-income geographies is substantially lower than its overall share of the home purchase market. In drawing conclusions, we considered that the opportunity to lend in low-income geographies is limited as there are a relatively low number of owner-occupied housing units within this segment of the community.

The geographic distribution of FirstMerit's home improvement loans is good. The percentage of loans in moderate-income geographies exceeds the percentage of owner-occupied housing units located in moderate-income areas. FirstMerit's market share of lending in moderate-income areas was near to its overall home improvement share in Canton in 2002. The percentage of loans in low-income geographies is below the percentage of owner-occupied housing units located in those areas. Also, FirstMerit's 2002 market share in the low-income geographies is substantially lower than its overall share of the home purchase market. In drawing conclusions, we considered that the opportunity to lend in low-income geographies is limited as there are a relatively low number of owner-occupied housing units within this segment of the community.

The geographic distribution of home refinance loans is poor. The percentage of loans in low-income and moderate-income geographies is well below the percentage of owner-occupied housing units located in those segments of the community. FirstMerit's

market share of lending in low-income areas significantly exceeded its overall home refinance share in 2002. The bank's market share in the moderate-income geographies was near to its overall home refinance share. However, market share performance in 2000 and 2001 reflected weak performance in low-income and moderate-income areas. In drawing conclusions, we considered that the opportunity to lend in low-income geographies is limited as there are a relatively low number of owner-occupied housing units within this segment of the community.

The volume of multifamily lending activity by FirstMerit in Canton is not sufficient to allow for a meaningful analysis.

Cleveland Assessment Area

In drawing geographic distribution conclusions for the Cleveland AA, we gave some consideration to the fact that FirstMerit's presence varies significantly within the different counties comprising this area, as discussed within the Market Profile section in appendix C. In particular, a small branch network and strong competition within the City of Cleveland impacts FirstMerit's ability to address the needs of that portion of the community, which includes a large share of the low- and moderate-income neighborhoods.

The geographic distribution of home purchase loans is adequate. The percentage of loans in moderate-income geographies exceeds the percentage of owner-occupied housing units located in moderate-income areas. FirstMerit's market share of lending in moderate-income areas significantly exceeded its overall home purchase share in Cleveland in 2002. The percentage of loans in low-income geographies is significantly below the portion of owner-occupied housing units within the area. FirstMerit's market share of lending in low-income areas is significantly below its overall share of the home purchase market.

The geographic distribution of home improvement loans is excellent. The percentage of loans in moderate-income geographies significantly exceeds the percentage of owner-occupied units located in those areas. Furthermore, FirstMerit's 2002 market share for loans in moderate-income areas significantly exceeded the bank's overall home improvement market share. The percentage of loans in low-income geographies is near the percentage of owner-occupied housing units located in that segment of the community. FirstMerit's market share in low-income areas was lower than its overall share of the home improvement market in 2002.

The geographic distribution of home refinance loans is adequate. The percentage of loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units located in moderate-income areas. FirstMerit's market share of lending in moderate-income areas is near its overall home refinance share in Cleveland. The percentage of loans in low-income geographies is well below the portion of owner-occupied housing units within the area. FirstMerit's market share of lending in low-income areas is well below its overall share of the home refinance market.

The geographic distribution of multifamily loans is good. The percentage of loans in moderate-income geographies exceeded the percentages of multifamily housing units located in those areas. FirstMerit's market share in moderate-income areas exceeded its overall share of the multifamily housing market. The percentage of loans in low-income geographies is lower than the percentage of multifamily housing units located in low-income areas. FirstMerit made no multifamily loans in the low-income segments of the Cleveland AA in 2002.

Small Loans to Businesses

Refer to Table 6 for the state of Ohio in appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Akron Assessment Area

The geographic distribution of small loans to businesses in Akron is excellent. The percentage of loans in both low-income and moderate-income geographies exceeds the portion of businesses located in those areas. Furthermore, FirstMerit's 2002 market share in both low-income and moderate-income areas exceeded its overall share of the small business market.

Canton Assessment Area

The geographic distribution of small loans to businesses in Canton is good. The percentage of loans in low-income geographies is near the percentage of businesses located in those areas. During 2002, FirstMerit's market share in the low-income areas significantly exceeded its overall share of the small business market. The percentage of loans in moderate-income areas is below the percentage of businesses located there. The bank's market share in moderate-income areas is near its overall small business share.

Cleveland Assessment Area

The geographic distribution of small loans to businesses in Cleveland is adequate. The percentage of loans in low-income and moderate-income geographies is below the percentages of businesses located in those areas. While FirstMerit's market share of small business lending in moderate-income areas exceeded its overall market share, its share in the low-income areas was lower.

Lending Gap Analysis

We reviewed summary reports detailing FirstMerit's lending activity over the evaluation period for home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Inside/Outside Ratio

A substantial majority (94 percent) of originated and purchased loans reported by FirstMerit during the evaluation period are within the bank's Ohio and Pennsylvania AAs. Ninety-four percent of the bank's home mortgage loans, 94 percent of small loans to businesses, and 99 percent of CD loans are within the AAs. These calculations are done on a bank-wide basis, and affiliate lending is not included. This record of lending within the AAs was given positive consideration when drawing conclusions relative to the overall geographic distribution of lending performance for the bank as a whole.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of FirstMerit's loans is excellent. This based on excellent home mortgage and good small business distributions in the Akron and Cleveland AAs, and good distributions of home mortgage and small business loans in the Canton AA. Based on volume, home mortgage lending performance is weighted more heavily than small business lending. The volume of small loans to farms was too small to perform a meaningful analysis.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 for the state of Ohio in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community. Refer to the Market Profiles in appendix C for the demographic information and additional discussion regarding the poverty rates in each full-scope AA.

Akron Assessment Area

The distribution of home purchase loans to borrowers of different income levels is excellent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income borrowers in the AA. FirstMerit's 2002 market share of moderate-income borrowers exceeds the bank's overall home purchase share. While the percentage of loans to low-income borrowers is somewhat lower than the percentage of low-income borrowers in the area, consideration was given to the impact that the area's poverty level has on lending to the low-income segment of the community. FirstMerit's market share of lending to low-income borrowers significantly exceeded its overall home purchase market share in 2002.

The distribution of home improvement loans to borrowers of different income levels is excellent. The percentages of loans made to both low-income and moderate-income borrowers exceed the percentages of low- and moderate-income borrowers within the AA, especially for the moderate-income segment. Furthermore, FirstMerit's 2002 market shares for both the low-income and moderate-income borrowers exceed its overall home improvement market share in Akron.

The borrower distribution of home refinance loans is excellent. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income borrowers in the AA. FirstMerit's 2002 market share for moderate-income borrowers exceeds its overall share of home refinance lending in Akron. While the percentage of loans to low-income borrowers is lower than the percentage of low-income borrowers in the area, consideration was given to the impact that the area's poverty level has on lending to this segment of the community. FirstMerit's market share of lending to low-income borrowers was near its overall home refinance market share in 2002.

Canton Assessment Area

The distribution of home purchase loans to borrowers of different income levels is excellent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income borrowers in the AA. FirstMerit's 2002 market share of moderate-income borrowers was near to the bank's overall home purchase share. The percentage of loans to low-income borrowers is somewhat lower than the percentage of low-income borrowers in the area. In drawing conclusions, consideration was given to the impact that the area's poverty level has on lending to the low-income segment of the community. Furthermore, FirstMerit's market share of lending to low-income borrowers greatly exceeded its overall home purchase market share in Canton.

The distribution of home improvement loans to borrowers of different income levels is excellent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income borrowers in the AA. FirstMerit's 2002 market share of moderate-income borrowers exceeds the bank's overall home improvement share. The percentage of loans to low-income borrowers is near to the percentage of

low-income borrowers in the area. FirstMerit's market share of this segment of the community exceeded its overall home improvement market share in 2002.

The borrower distribution of home refinance loans is good in Canton. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income borrowers in the AA. FirstMerit's 2002 market share for moderate-income borrowers is somewhat lower than its overall share of home refinance lending in the area. While the percentage of loans to low-income borrowers is lower than the percentage of low-income borrowers in the area, consideration was given to the impact that the area's poverty level has on lending to this segment of the community. FirstMerit's market share of lending to low-income borrowers was somewhat lower than its overall home refinance market share in 2002.

Cleveland Assessment Area

The distribution of home purchase loans to borrowers of different income levels is excellent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income borrowers in the AA. FirstMerit's 2002 market share of moderate-income borrowers is near to the bank's overall home purchase share. While the percentage of loans to low-income borrowers is somewhat lower than the percentage of low-income borrowers in the area, consideration was given to the impact that the area's poverty level has on lending to the low-income segment of the community. FirstMerit's market share of lending to low-income borrowers greatly exceeded its overall home purchase market share in 2002.

The distribution of home improvement loans to borrowers of different income levels is excellent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income borrowers in the AA. FirstMerit's 2002 market share of moderate-income borrowers exceeds the bank's overall home improvement share. The percentage of loans to low-income borrowers is near to the percentage of low-income borrowers in the area. FirstMerit's market share of this segment of the community significantly exceeded its overall home improvement market share in 2002.

The borrower distribution of home refinance loans is excellent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income borrowers in the AA. FirstMerit's 2002 market share for moderate-income borrowers was near to its overall share of home refinance lending in Cleveland. While the percentage of loans to low-income borrowers is lower than the percentage of low-income borrowers in the area, consideration was given to the impact that the area's poverty level has on lending to this segment of the community. FirstMerit's market share of low-income borrowers exceeded its overall home refinance market share in 2002.

Small Loans to Businesses

Refer to Table 11 for the state of Ohio in of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Akron Assessment Area

The borrower distribution of small loans to businesses in Akron is good. The percentage of loans to businesses with revenues of \$1 million or less is somewhat lower than the percentage of area businesses that have revenues of \$1 million or less. But, FirstMerit's share to this segment of the business market significantly exceeded its overall share of small business lending in 2000, 2001, and 2002. Furthermore, FirstMerit has a good record of making loans of all size levels, with more than half at amounts for \$100,000 or less.

Canton Assessment Area

The borrower distribution of small loans to businesses in Canton is good. The percentage of loans to businesses with revenues of \$1 million or less is somewhat lower than the percentage of area businesses that have revenues of \$1 million or less. But, FirstMerit's share to this segment of the business market significantly exceeded its overall share of small business lending in 2000, 2001, and 2002. Furthermore, FirstMerit has a good record of making loans of all size levels, with more than half at amounts for \$100,000 or less.

Cleveland Assessment Area

The borrower distribution of small loans to businesses in Cleveland is good. The percentage of loans to businesses with revenues of \$1 million or less is somewhat lower than the percentage of area businesses that have revenues of \$1 million or less. But, FirstMerit's share to this segment of the business market significantly exceeded its overall share of small business lending in 2000, 2001, and 2002. Furthermore, FirstMerit has a good record of making loans of all size levels, with more than half at amounts for \$100,000 or less.

Community Development Lending

Refer to Table 1 Lending Volume for the state of Ohio in appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

FirstMerit has a strong record of CD lending, which has a positive impact on Lending Test conclusions for the Akron, Canton and Cleveland AAs. CD lending activities have done a good job to address primary identified needs, especially affordable housing. In addition to the CD loans reflected within Table 1, some loans that are included in home mortgage and small loans to business data have CD characteristics. As FirstMerit has satisfactorily addressed the CD needs of its AAs, positive consideration was also given to CD loans located outside of all AAs. For analysis purposes, the two CD loans made outside of FirstMerit's AAs were allocated to the Columbus AA due to their close proximity to that area and due to the projects having some potential positive impact to the population of the Columbus AA. Highlights of FirstMerit's CD lending activities are summarized for each full scope AA below.

Akron Assessment Area

FirstMerit's CD lending activity is excellent in the Akron AA. During this evaluation period FirstMerit made 32 CD loans totaling \$17.8 million in the Akron AA. These loans include a mix of renewals of existing CD loans as well as new loans that address the affordable housing and social service needs of low- and moderate-income persons. Some of the most significant CD lending activities are summarized as follows:

- In support of a neighborhood revitalization effort, FirstMerit extended a \$3.9 million loan for the construction of 40 affordable scattered single-family homes for low- and moderate-income families in a moderate-income area of Akron.
- FirstMerit provided a \$1.2 million line of credit, plus renewals, to a local non-profit agency that provides services to mentally ill individuals, the majority of who are low- and moderate-income.
- The bank made three loans, including a line of credit renewed and increased to \$750,000, to a non-profit company that purchases, rehabilitates, and sells affordable homes to low- and moderate-income families.
- FirstMerit made a \$1 million unsecured loan, including a \$500,000 dollar increase, to a housing development corporation for the renovation of affordable housing properties. The organization rents the renovated homes to low- and moderate-income families. Renting leads to the eventual purchase of the homes by the families.
- FirstMerit originated 3 loans totaling \$800,000 to a housing authority that provides affordable housing to low- and moderate-income families. One of these loans was for the rehabilitation of 56 apartment units.

As an example of FirstMerit's ongoing CD lending initiative, the bank has also committed to extend permanent financing for a grocery store and shopping center in a moderate-income section of Akron. As discussed under the Investment and Service

tests, FirstMerit has taken a leading role in supporting this development. The project is currently under construction with financing from FirstMerit CDC. This is a key redevelopment project, as there are no other grocery stores in the area. As funding did not occur during the evaluation period, this is not reflected on Table 1.

In addition to making CD loans, FirstMerit extended six small loans to businesses totaling \$843,000 that had CD characteristics but were required to be reported as small loans to businesses. Therefore, these loans are not reflected as CD on Table 1.

Canton Assessment Area

FirstMerit's CD lending activity is excellent in the Canton AA. Responsiveness to community needs is strong, considering the needs of the area, local competition, and CD lending opportunities. FirstMerit originated 45 CD loans totaling \$14.6 million in this AA. These loans include a mix of renewals of existing CD loans as well as new loans that address the affordable housing and social service needs of low- and moderate-income persons. Some of the most significant loans are summarized as follows:

- The bank provided four loans totaling \$7 million for the construction and permanent financing of two affordable housing low-income housing tax credit projects in Stark County. Each project consisted of 59 housing units.
- Loans totaling \$800,000 were made to a housing agency that focuses on providing affordable housing for low- and moderate-income individuals. Loans included unsecured lines of credit and a term loan to refinance and rehabilitate a 56-unit apartment building.
- FirstMerit originated a \$1 million line of credit for a company to provide affordable housing to low- and moderate-income individuals. Loan proceeds are used to purchase and renovate residential properties. The company leases the properties primarily to low- and moderate-income individuals, and assists them with credit counseling to prepare them for future home purchases.
- FirstMerit refinanced a \$1.6 million loan to a local organization that purchases and rehabilitates homes in low- and moderate-income neighborhoods for housing that is affordable to low- and moderate-income individuals.
- FirstMerit provided loans totaling \$645,000 to a nonprofit development company that operates a chemical abuse center whose clients range from being low-income to indigent.

In addition to making CD loans, FirstMerit extended 13 home mortgage and small loans to businesses totaling \$2.7 million that had CD characteristics. These loans are not reflected as CD on Table 1.

Cleveland Assessment Area

FirstMerit's CD lending activity is excellent in the Cleveland AA. Responsiveness to affordable housing needs is strong. FirstMerit originated 73 qualified loans in the AA totaling nearly \$30 million. These loans include a mix of renewals or extensions of existing CD loans as well as new loans that address the affordable housing and social service needs of low- and moderate-income persons. Some examples are:

- A \$3.6 million loan to provide construction and permanent funds to construct 63 housing units using low-income housing tax credits in Lorain.
- Loans totaling \$4.4 million to refinance an affordable housing apartment building where 89 percent of the 112 units are designated for low- to moderate-income tenants as Section 8 Housing for HUD.
- A \$1.8 million loan to purchase an 84-unit affordable housing apartment building. More than half of the residents receive Section 8 housing assistance.
- A \$1.4 million construction loan for a multi-tenant office and retail facility in a moderate-income area of Cleveland. The primary tenant is a social service agency serving low-income individuals. The building also houses small businesses that maintain jobs for low- and moderate-income individuals.
- FirstMerit provided 40 loans totaling over \$6 million in amounts under \$500,000 to 12 local non-profits in support of affordable housing initiatives for low- and moderate-income individuals.
- FirstMerit provided 10 loans totaling \$1.2 million in amounts under \$500,000 to seven local non-profits to support social service initiatives for low- and moderate-income individuals.

In addition to making CD loans, FirstMerit extended 11 home mortgage and small loans to businesses totaling \$3.3 million that had CD characteristics. These loans are not reflected as CD on Table 1.

Product Innovation and Flexibility

Product flexibility has a positive impact on our Lending Test conclusions for the Akron, Canton, and Cleveland AAs. FirstMerit's Best Mortgage Loan Program has helped address the affordable housing needs of the community.

FirstMerit offers its Best Mortgage Loan Program (formerly known as First Choice) bank wide. This flexible home mortgage program is designed to address the home mortgage needs of low- and moderate-income individuals. Underwriting and funding is performed through FirstMerit Mortgage Company. Costs are reduced as application and origination fees are waived, higher debt ratios are allowed, mortgage insurance is not

necessary, and downpayment requirements are low and alternative sources are allowed. The program has been very successful. More than 1,100 loans totaling nearly \$76 million were originated between 2000 and 2003. This includes 199 loans in the Akron AA, 152 loans in the Canton AA, and 412 loans in the Cleveland AA.

Management has established a good marketing and service-oriented program for Best loans in Akron. The Unity Banking Partnership program is an affiliation with area Akron churches to provide credit counseling and convenient mortgage application processing within low- and moderate-income areas. Refer to the Service Test section of this evaluation for additional information.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Columbus, Mansfield, Toledo, and non-metropolitan AAs is weaker than the bank's overall "Outstanding" rating in Ohio. Refer to the Tables 1 through 12 for the state of Ohio in appendix D for the facts and data that support these conclusions.

Performance in the Columbus and Mansfield AAs is weaker than the bank's overall performance due to weaker geographic distribution records and lower levels of CD lending. Performance is weaker in the Toledo and non-metropolitan AAs due to weaker geographic and borrower distribution records, and lower levels of CD lending. Due to the relative size of these areas, the weaker performance did not impact our overall Lending Test conclusions for Ohio.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Ohio is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Akron AA is good, and adequate in the Canton and Cleveland AAs.

Refer to Table 14 for Ohio in appendix D for the facts and data used to evaluate the bank's level of qualified investments.

FirstMerit's qualified investments are primarily comprised of FirstMerit Corporation's investment in the FirstMerit CDC; investments in Ohio Equity Fund Limited Partnership funds and other low-income housing tax credit facilities; and grants to local organizations to support CD initiatives within the bank's AAs. While FirstMerit's investments are responsive to local needs, they are not innovative or complex.

FirstMerit Corporation's \$7.4 million equity investment in the FirstMerit CDC was given particular positive consideration when drawing conclusions regarding investment performance within individual AAs as funds were used to address particular credit

needs. Projects financed by the CDC are types that the bank would not normally have been able to provide similar degrees of support, as less stringent lending standards are used. We also gave consideration to how CDC funds have been deployed, noting that funds repaid from prior-period projects have been redeployed for new projects. For evaluation purposes, we allocated the investment in the CDC to individual AAs consistent with the dollar amount and location of CDC projects.

FirstMerit has continuously participated in the Ohio Equity Fund Limited Partnership program administered by the Ohio Capital Corporation for Housing. Funds are used to construct and rehabilitate affordable housing rental units throughout Ohio, including the bank's AAs. These investments allow the bank to take advantage of low-income housing tax credits. During the evaluation period FirstMerit committed to investing in two funds, while continuing to fund commitments in eight funds established during prior periods. While investments in these funds are reflected as statewide investments on Table 14, for analysis purposes we identified the underlying projects that impacted the bank's AAs and allocated the bank's investments to the AAs accordingly.

During prior evaluation periods, FirstMerit and its predecessor banks initiated investments in the National Equity Funds (NEF) and the Enterprise Foundation. These national organizations have affordable housing and community development purposes that benefit broader areas that include the bank's AAs. While investments in these funds are reflected as investments in national funds on Table 14, for analysis purposes these qualified investments were allocated to the AAs where underlying projects were located.

In drawing our conclusions on investment performance in AAs, we considered the bank's level of complexity and capacity, as well as the degree of competition and opportunities available for investment. Refer to the Market Profiles in appendix C. As FirstMerit has satisfactorily addressed the CD needs of its AAs, positive consideration was also given to qualified investments that do not have a direct impact on any AA. These are primarily investments made by FirstMerit and its predecessor banks during previous evaluation periods that are still outstanding. They are reflected on Table 14 as Outside of AAs in Ohio.

Akron Assessment Area

Investment activity in the Akron AA is good. Investments have primarily addressed the affordable housing needs of homeowners and renters. As described in the Market Profile section of appendix C, we determined that there have been investment opportunities in the area, and that competition for major opportunities is significant.

During the evaluation period the bank made investments totaling \$2.6 million comprised of:

- A \$2.1 million current period allocation of FirstMerit Corporation's investment in the FirstMerit CDC. Loans by the CDC supported five affordable housing projects initiated during the evaluation period in the Akron area. This level of

activity is considered particularly good. Furthermore, the CDC is financing the construction of a key shopping center development that includes a grocery store in a moderate-income section of Akron, as also discussed under the CD loan and Service Test sections.

- Grants totaling \$505,000 to 51 community organizations for community development purposes within the AA.

In addition, \$285,000 in current period funding of Ohio Equity Fund investments has directly impacted the Akron AA. Eleven affordable housing projects involving over 700 units have been financed by the eight funds FirstMerit has invested in to date. Furthermore, unfunded investment commitments for two additional funds are helping to finance another six affordable housing projects involving 460 units within the AA.

Investments made during prior evaluation periods that are still outstanding consist of an affordable housing tax credit project in downtown Akron, an allocated portion of FirstMerit Corporation's investment in the FirstMerit CDC, and previously funded portions of Ohio Equity Fund investments. The funding of these projects has a continuing positive impact on the AA.

Canton Assessment Area

Investment activity in the Canton AA is adequate. Investments have primarily addressed the affordable housing and social service needs of low- and moderate-income individuals. As described in the Market Profile section of appendix C, we determined that a moderate level of investment opportunities exist in the AA, and that competition is strong.

Current period investments in Canton are comprised of grants totaling \$365,000 to 29 community organizations for community development purposes within the AA. In addition, \$215,000 in current period funding of Ohio Equity Fund investments has directly impacted the Canton AA. Five affordable housing projects in the Canton AA involving over 200 units have been financed by the eight funds that FirstMerit has invested in to date. Furthermore, an unfunded investment commitment for an additional fund is helping to finance another two affordable housing projects involving nearly 60 units within the AA.

Investments made during prior evaluation periods that are still outstanding consist of an allocated portion of FirstMerit Corporation's investment in the FirstMerit CDC, and previously funded portions of Ohio Equity Fund investments. These investments have a continuing positive impact on the AA.

Cleveland Assessment Area

Investment activity in the Cleveland AA is adequate. Investments have primarily addressed affordable housing needs and needs of low- and moderate-income individuals. As described in the Market Profile section in appendix C, we determined that investment opportunities exist in the AA, and that competition for the major investment projects is high.

During the evaluation period FirstMerit investments totaled \$631,000 comprised of the following:

- A \$300,000 current period allocation of FirstMerit Corporation's investment in the FirstMerit CDC. Loans by the CDC supported two affordable housing projects initiated during the evaluation period in the Cleveland AA.
- Grants totaling \$331,000 to 45 community organizations for community development purposes within the AA.

In addition, \$125,000 in current period funding of Ohio Equity Fund investments has directly impacted the Cleveland AA. Eight affordable housing projects involving nearly 575 units have been financed by the eight funds FirstMerit has invested in to date. Furthermore, an unfunded investment commitment for an additional fund is helping to finance another four affordable housing projects involving 165 units within the AA.

Investments made by FirstMerit during prior evaluation periods that are still outstanding and have a continuing positive impact on the AA total \$3 million. They consist of Ohio Equity Fund projects, an investment in the Cleveland Neighborhood Equity Fund, and an investment in First Cuyahoga Housing Limited Partnership. In addition, FirstMerit's investments in National Equity Funds and the Enterprise Foundation originated in 1995, 1996, and 1997 continue to benefit the AA by financing four affordable housing projects in Cleveland.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Mansfield AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test in Ohio. In the Columbus and non-metropolitan AAs the bank's performance is stronger than the bank's overall performance in the state. The stronger performance is reflected by higher levels of investments, especially those from the current evaluation period, relative to the bank's presence in those areas. The stronger performance did not impact our overall conclusions regarding the bank's Investment Test rating in Ohio. The bank's performance in the Toledo AA is weaker than the bank's overall Investment Test performance as reflected by a lower level of investments. The weaker performance did not impact our overall conclusions regarding the bank's Investment Test rating in Ohio. When drawing conclusions on performance in limited-scope AAs, we factored in allocations of Ohio Equity Fund activity within each

respective area based on underlying projects financed by those funds within the AAs. Refer to Table 14 for Ohio in appendix D for the facts and data that support our conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Ohio is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Akron and Canton AAs is good, and adequate in the Cleveland AA.

Retail Banking Services

Refer to Table 15 for the state of Ohio in appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

FirstMerit's delivery systems are accessible to geographies and individuals of different income levels throughout the full-scope AAs. Accessibility is good in the Akron and Canton AAs, and adequate in the Cleveland AA.

In the Akron AA, the percentage of offices located in low-income geographies exceeds the portion of the population living in those areas. The percentage of offices in moderate-income geographies is less than the portion of the population living in those areas. The low- and moderate-income segments of the community are primarily concentrated in and intermixed within a contiguous portion of the City of Akron. FirstMerit's branch network makes products and services accessible throughout this section of the community. During the evaluation period, FirstMerit closed two branches, both located in middle-income geographies. This activity did not have a significant impact on the availability of FirstMerit products and services in the AA.

The percentage of offices in the low-income geographies of the Canton AA exceeds the portion of the AA's population living in those areas. The percentage of offices in moderate-income geographies is lower than the portion of the population living there. However, the differences in percentages are not significant, as they represent only one branch in each income category. During the evaluation period one office was closed within the AA, located in an upper-income geography. This activity did not have a significant impact on the availability of FirstMerit products and services in the AA.

In the Cleveland AA, the distribution of FirstMerit's offices throughout low- and moderate-income geographies is lower than the portion of the population living in those geographies. During the evaluation period, the bank opened one branch in an upper-income geography while closing seven others within the AA. This activity had no impact

to low-income geographies. In moderate-income areas, two offices, both located in Lorain County were closed. Additionally, the bank closed two offices located in middle-income geographies and three offices located in upper-income geographies. These activities had some impact to service accessibility, but did not materially impact our conclusions regarding the overall performance in the AA under the Service Test.

The level of FirstMerit's office hours and services offered throughout each of the full-scope AAs is good. Office hours and services (including the availability of loan officers) provided in each AA are comparable among all locations regardless of the income level of the geography where the offices are located. Banking hours and services provided during the week are supplemented by Saturday hours at the majority of the banking facilities located in the three AAs, including those located in low- and moderate-income areas.

FirstMerit offers a checking account product in all AAs that requires no minimum balance or monthly account fees. This allows customers, including those who are low- and moderate-income, to maintain accounts without regular maintenance fees. The bank also offers a checking account tailored to senior citizens that provides additional benefits with qualifying balances. Additionally, FirstMerit offers no-fee business checking products designed for businesses with minimal and moderate account activity.

FirstMerit's ATM network in Ohio consists of 166 units, including 20 units that are offsite from FirstMerit offices. With ATMs at nearly all branches and several additional locations, this alternative delivery system allows customers to access their accounts outside of regular banking hours in each AA. In the Akron MSA the percentage of ATMs in low-income geographies (20 percent) substantially exceeds the portion of the AAs population residing there (6 percent). The percentage of ATMs in moderate-income geographies (11 percent) is less than percentage of the AAs population residing there (21 percent). Six off-site ATMs, including four in low-income geographies are located in the Akron MSA. In the Canton AA, the percentage of ATMs in low-income geographies (5 percent) exceeds the portion of the AAs population residing there (2 percent). The percentage of ATMs in moderate-income geographies (16 percent) is near to the portion of the AAs population residing there (17 percent). Three off-site ATMs, including one in a moderate-income geography are located in the Canton AA. In the Cleveland AA, the portion of ATMs in low-income geographies (3 percent) is lower than the percentage of the population residing in those geographies (9 percent). In moderate-income geographies the percentage of ATMs (13 percent) is less than the percentage of the population residing in those geographies (17 percent). Nine offsite ATMs are within the Cleveland-Elyria-Lorain MSA, including two in moderate-income geographies.

Alternative delivery systems also include a toll-free telephone banking service and free Internet banking and bill paying service, which are offered in each AA. These services allow customers to obtain deposit and loan account information and rates, transfer funds, pay bills, and apply for various loan products. As specific information is not available on the degree in which low- and moderate-income individuals and geographies are impacted by these services, significant weight cannot be placed on

these alternative delivery systems when drawing conclusions for performance in the individual AAs.

Community Development Services

FirstMerit's performance in providing CD services to each of the full-scope AAs is good. At times, FirstMerit and its employees have taken on leadership roles in substantive CD initiatives within the AAs. Primary services include providing financial expertise to a variety of community service and development organizations through board membership; homeownership seminars and workshops; credit counseling; and the provision of technical financial assistance for consumers and small businesses. FirstMerit has assisted local CD organizations by acting as a sponsor for loan applications to the Federal Home Loan Bank of Cincinnati (FHLB). As sponsor, the bank assists the organization with the application. During the evaluation period, one project application in the Akron AA and one in the Cleveland AA were awarded Community Investment Program loans. In addition, five direct subsidy grants were awarded in the Canton AA. Examples of some of the primary CD services provided during the evaluation period are discussed under each full-scope AA below.

Akron Assessment Area

Community Development Services have addressed the affordable housing, services for the low- and moderate-income individuals and areas of the community, and the small business financing needs in the Akron AA. Some examples are as follows:

- FirstMerit continues to take a leadership position in administering the Unity Banking Partnership program implemented during the previous evaluation period. The partnership, an alliance between local churches, a consulting company, a consumer credit company, and FirstMerit, has helped to provide banking services to low- and moderate-income individuals and families. Workshops and seminars are held at area churches where financial education, credit counseling, and loan application assistance is provided. FirstMerit employees provide opportunities for participants to apply for loans. Under this program, 81 deposit accounts and 35 loans, including 30 home mortgages for \$3.3 million, were opened during the evaluation period.
- A senior FirstMerit officer serves as a board member of a neighborhood development corporation in Akron. The officer provides technical assistance about financial services, and also serves on the building fund committee. This organization has been actively promoting economic and community development by providing affordable housing to low- and moderate-income families, a home weatherization program as well as small business incubation within low- and moderate-income portions of the area. The organization is also developing a \$9 million retail shopping center in a moderate-income neighborhood. The project is financed through a combination of public/private dollars including FirstMerit and FirstMerit CDC, as discussed under the lending and investment

tests. Individuals attempting to move off welfare will fill an estimated 76 percent of the jobs generated by the project. The anchor tenant is a full-service supermarket, a business that has been absent from the surrounding neighborhoods since 1994. In addition, this organization constructed ten affordable homes as well as a 40-unit senior apartment building. These developments are targeted primarily to individuals and families with incomes of 65 percent or less of area median income.

- A senior FirstMerit officer serves as a board member and provides technical assistance about financial services to a second neighborhood development corporation in Akron. This organization promotes the development of affordable housing in the Akron area, and partnered with another organization to develop a 39-unit single-family project for low- and moderate-income households.
- Two bank officers have served as board members and provide technical assistance about financial services to a community fund organization that provides loans to small businesses and start-up businesses in the City of Akron. Loans can be used to purchase inventory, carry eligible receivables or finance fixed assets such as renovations of business premises. Lines of credit to cover cash shortfalls due to the timing of receivables are also eligible uses.

Canton Assessment Area

Community Development Services have primarily addressed the affordable housing needs of the AA. Examples are:

- A senior FirstMerit officer serves on the board of a community development association in Stark County and provides technical assistance about financial matters including budget and fundraising. The nonprofit organization is committed to neighborhood revitalization, community economic development, energy conservation, family development, housing development, job training and transportation. Clients are primarily low- and moderate-income individuals and families. The organization has developed 118 affordable housing units, including new construction and rehabbed properties. Most recently, the organization constructed 59 new affordable homes through two projects involving low-income housing tax credits. FirstMerit also participated by providing CD loans. Other initiatives include providing downpayment assistance and financial counseling to prospective homebuyers and a workforce-training program.
- A senior FirstMerit officer represents the bank and provides technical support to the local Habitat for Humanity chapter, a national affordable housing organization. FirstMerit has also sponsored applications to the Federal Home Loan Bank (FHLB) of Cincinnati for this organization.
- A bank officer serves as Vice Chairman of a community service organization that primarily has low- and moderate-income clients. Programs including first-time

homebuyer down payment assistance; providing matching funds for individuals to save for home purchase, start a business or attend school; and homeownership education. The organization is targeting to develop 30 affordable single-family homes for low- and moderate-income individuals on lots in low- and moderate-income portions of Canton.

- Two bank officers are active in a local development board. One officer serves as Treasurer and the other is a member of a loan review committee. In part, the organization assists small businesses in obtaining financing through U.S. Small Business Administration, State of Ohio, and local revolving loan fund programs.

Cleveland Assessment Area

Community Development Services have primarily addressed the affordable housing and revitalization needs of the AA. Examples are:

- A bank officer is a board member who provides financial and fundraising expertise to a CD organization in Lorain County. The purpose of this non-profit organization is to assist low- and moderate-income individuals and families. Their current focus is on providing comprehensive child development, family support, and economic development services, while promoting self-sufficiency to families. Programs include Head Start education, housing and energy services, home ownership training, senior services, emergency energy conservation, and a home weatherization program.
- Three bank officers have served on the loan review committee of a non-profit service organization established by the City of Cleveland. The organization is a partnership between private lenders, local government, and property owners with a focus on the rehabilitation, improvement, and reinvestment in primarily low- and moderate-income neighborhoods.
- A senior FirstMerit officer provides technical lending assistance to a neighborhood development corporation in Cleveland. This is an umbrella not-for-profit organization that provides technical assistance and investment opportunities to community development groups, foundations, non-profit agencies and education institutions for low- to moderate-income community development projects.
- A bank officer serves as a board member and is the Chairman of the Finance Committee of a neighborhood housing development corporation in Cleveland. Programs include the construction of quality affordable housing structures as well as revitalization and stabilization efforts targeted toward Cleveland's eastside neighborhoods.
- A bank officer has served as a board member and Chairman of the Loan Review Committee for the Cleveland Empowerment Zone. This HUD development program is designed to help revitalize and reinvest in the

communities of Fairfax, Glenville, Hough, and MidTown Cleveland. The City of Cleveland received \$177 million of loan and grant funds for a ten-year period to help businesses expand or relocate within the Empowerment Zone.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Service Test in the Mansfield AA is not inconsistent with the bank's overall "High Satisfactory" Service Test rating in Ohio. In the Columbus, Toledo, and non-metropolitan AAs, performance is weaker than the "High Satisfactory" Service Test rating in Ohio. The weaker performance is centered in the lower level of accessibility of FirstMerit's offices in the various income segments of the AAs. FirstMerit does not have any branch facilities located in the moderate-income portions of the Columbus, Toledo or non-metropolitan AAs, or in the low-income areas of Toledo. However, this fact is mitigated somewhat by the low number of low- and moderate-income geographies and the low percentages of populations located in those areas. The weaker performance did not impact the overall Service Test rating for Ohio. Please refer to Table 15 in appendix C for the facts and data that support these conclusions.

State of Pennsylvania

CRA Rating for Pennsylvania:	<u>Satisfactory</u>
The lending test is rated:	<u>High Satisfactory</u>
The investment test is rated:	<u>Low Satisfactory</u>
The service test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- The geographic distribution of lending is good. A substantial majority of loans are made within the bank's assessment areas.
- The distribution of loans among borrowers of different income levels and businesses of different sizes is good.
- Qualified investment levels are adequate.
- The accessibility of FirstMerit's delivery systems to the geographies and individuals of different income levels is good. Community development service activity is also good.

Description of Institution's Operations in Pennsylvania

FirstMerit provides a full range of residential, consumer, and commercial financial products and services in Lawrence County, a non-metropolitan area in western Pennsylvania. This single AA is the only part of Pennsylvania that FirstMerit operates in. With four offices, operations in this state represent a small portion of FirstMerit's overall operations. Approximately three percent of reportable loans and twelve percent of deposits are based in this area. With deposits totaling \$916 thousand as of June 2003, FirstMerit is the largest bank in terms of insured deposits with a 44 percent share of the Lawrence County market. Competition is strong as 9 institutions operate a total of 34 offices in a county with a population less than 100 thousand. Refer to the Market Profiles section for the state of Pennsylvania in appendix C for detailed demographics and other performance context information for the Lawrence County AA.

Scope of Evaluation in Pennsylvania

We used full-scope procedures to assess the bank's performance in the Lawrence County AA, which is the basis for rating FirstMerit's performance in Pennsylvania. Please refer to appendix A for information regarding which areas received full-scope and limited-scope reviews during this evaluation.

When drawing conclusions for the Lending Test, we weighed loan products based on FirstMerit's relative volume of each loan type, and the identified needs of the AA. In the

Lawrence County AA, we weighed home mortgage lending more than small business lending.

In drawing conclusions relative to the bank's performance, we took into consideration information derived from members of the community. We contacted four organizations operating within the Lawrence County AA. Refer to the Market Profile in appendix C for more information regarding community contacts performed during our full-scope analyses.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Pennsylvania is rated "High Satisfactory." Based on the full-scope review, performance in the Lawrence County AA is good.

Lending Activity

Refer to Tables 1 Lending Volume for Pennsylvania in appendix D for the facts and data used to evaluate the bank's lending activity.

FirstMerit's lending activity is adequate in Lawrence County. Home mortgage lending volumes are generally commensurate with the bank's share of the deposit market, and lower in regards to small business lending. FirstMerit ranks first in deposits among depository institutions with a 44 percent share of the market. According to 2002 aggregate HMDA data, FirstMerit is ranked first in volume of originated/purchased home purchase loans with a 15 percent market share, and second in volume of home mortgage refinance loans with a 6 percent market share. No institution has more than 10 percent of the refinance market. FirstMerit ranks fifth in home improvement lending volume with a 6 percent share behind four other banks operating in the region. FirstMerit is ranked thirteenth of 34 lenders in making small loans to businesses with a 2 percent market share. While the small business market is dominated by several national lenders, FirstMerit's business lending volume is also behind four of the institutions with offices in the local area.

Distribution of Loans by Income Level of the Geography

The geographic distribution of FirstMerit's loans is good in Pennsylvania. This is based on good home mortgage and excellent small business distributions in the Lawrence County AA. Based on volume, home mortgage lending performance is weighed greater than small business lending. FirstMerit did not originate or purchase any multifamily

loans during the period, and the volume of small loans to farms was too small to perform meaningful analyses.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 for the state of Pennsylvania in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases. In drawing conclusions, we considered that the opportunity to lend in low-income geographies is limited as there are a relatively low number of owner-occupied housing units within this segment of the community.

The geographic distribution of home purchase loans is excellent. The percentages of loans in low-income and moderate-income geographies exceed the percentages of owner-occupied housing units in those geographies. Furthermore, FirstMerit's 2002 market share for loans in moderate-income areas was more than twice the bank's overall home purchase share of the market, while its share in low-income areas was near to its overall share.

The geographic distribution of home improvement loans is good. The percentage of loans in low-income geographies is near to the percentage of owner-occupied housing for those areas. The overall percentage of loans in moderate-income areas exceeds the percentage of owner-occupied housing units, with 2003 performance being very strong. FirstMerit's 2002 market share for loans in moderate-income areas was near to its overall home improvement share of the market. The bank did not make any loans in low-income areas in 2002.

The geographic distribution of home refinance loans is poor. The percentages of loans in low-income and moderate-income geographies are lower than the percentages of owner-occupied housing units located in those areas. FirstMerit's 2002 home refinance market shares in both low- and moderate-income areas are lower than their overall home refinance share of the market.

Small Loans to Businesses

Refer to Table 6 for the state of Pennsylvania in appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent in Lawrence County. The percentage of loans in low-income geographies significantly exceeds the percentage of business located there. During 2002, FirstMerit's market share in the low-income areas significantly exceeded its overall share of the small business market. The percentage of loans in moderate-income areas was near to the percentage of businesses located in those areas. The bank's market share in moderate-income areas is somewhat below its overall small business share.

Lending Gap Analysis

We reviewed summary reports detailing FirstMerit's lending activity over the evaluation period for home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Inside/Outside Ratio

A substantial majority (94 percent) of originated and purchased loans reported by FirstMerit during the evaluation period are within the bank's Ohio and Pennsylvania AAs. Ninety-four percent of the bank's home mortgage loans, 94 percent of small loans to businesses, and 99 percent of CD loans are within the AAs. These calculations are done on a bank-wide basis, and affiliate lending is not included. This record of lending within the AAs was given positive consideration when drawing conclusions relative to the overall geographic distribution of lending performance for the bank as a whole.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of FirstMerit's loans is good in Pennsylvania. This is based on good home mortgage and good small business distributions in the Lawrence County AA. The volume of small loans to farms is not significant enough to perform meaningful analyses.

Home Mortgage Loans

Refer to Tables 8, 9 and 10 for the state of Pennsylvania in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. It is especially difficult for the segment of the low-income population that lives below the poverty line to afford and maintain a home. This has an impact on the opportunity to lend to the low-income population of the community. As discussed in the Market Profile within appendix C, 49 percent of low-income households within Lawrence County have income levels that are below the poverty line.

The distribution of home purchase loans to borrowers of different income levels is excellent. The percentage of loans to moderate-income borrowers significantly exceeds the percentage of moderate-income borrowers in the AA. FirstMerit's 2002 market share of moderate-income borrowers significantly exceeded the bank's overall home purchase share. The percentage of loans to low-income borrowers is near the percentage of low-income borrowers in the area. In drawing conclusions, consideration

was given to the impact that the area's poverty level has on lending to the low-income segment of the community. Furthermore, FirstMerit's market share of lending to low-income borrowers greatly exceeded its overall home purchase market share in Lawrence County.

The borrower distribution of home improvement loans is good. The percentage of loans to low-income borrowers is lower than the percentage of low-income borrowers in the AA. In drawing conclusions, consideration was given to the impact that the area's poverty level has on lending to the low-income segment of the community. Furthermore, FirstMerit's market share of lending to low-income borrowers is near its overall home improvement market share in Lawrence County. The percentage of loans to moderate-income borrowers is lower than the percentage of moderate-income borrowers in the AA, but the number of loans this represents is low. FirstMerit's 2002 market share of moderate-income borrowers is near the bank's overall home improvement market share for the area.

The borrower distribution of home refinance loans is adequate. The percentage of loans to low-income borrowers is lower than the percentage of low-income borrowers in the AA. However, we gave consideration to the impact that the area's poverty level has on lending to the low-income segment of the community. The percentage of loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income borrowers in the AA. While FirstMerit's market shares to both the low- and moderate-income borrowers were low in 2002, the bank's market shares to each of these segments of the community exceeded the bank's overall home refinance market share in 2001.

Small Loans to Businesses

Refer to Table 11 for the state of Pennsylvania in appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good. The percentage of loans to businesses with revenues of \$1 million or less is lower than the percentage of area businesses that have revenues of \$1 million or less. But, FirstMerit's share to this segment of the business market significantly exceeded its overall share of small business lending in 2000, 2001, and 2002. Market share data was not available for 2003. Furthermore, FirstMerit has a good record of making loans of all size levels, with more than half at amounts for \$100 thousand or less.

Community Development Lending

Refer to Table 1 Lending Volume for the state of Pennsylvania in appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD

loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Six CD loans to nonprofit organizations totaling \$349 thousand million were originated during the evaluation period. Loans supported initiatives providing affordable housing and services to low- and moderate-income individuals. CD lending has a neutral impact on Lending Test conclusions for Pennsylvania.

Product Innovation and Flexibility

Product flexibility has a positive impact on our Lending Test conclusions for the Lawrence County AA. FirstMerit's Best Mortgage Loan Program has helped address the affordable housing needs of the community. FirstMerit offers its Best Mortgage Loan Program (formerly known as First Choice) bank wide. This flexible home mortgage program is designed to address the home mortgage needs of low- and moderate-income individuals. Underwriting and funding is performed through FirstMerit Mortgage Company. Costs are reduced as application and origination fees are waived, higher debt ratios are allowed, mortgage insurance is not necessary, and downpayment requirements are low and alternative sources are allowed. The program has been very successful. More than 1,100 loans totaling nearly \$76 million were originated between 2000 and 2003. This includes 89 loans in the Lawrence County AA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Pennsylvania is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Lawrence County AA is adequate.

Refer to Table 14 for Pennsylvania in appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Investment activity in the Lawrence County AA is adequate. Investments have primarily addressed the social service needs of low- and moderate-income individuals and affordable housing needs. Refer to the Assessment Area Needs section of the Market Profile for the Lawrence County AA in appendix C. In drawing our conclusions relative to investment performance in this AA, we considered the bank's level of complexity and capacity for investment. As described in the Market Profile section, we determined that the level of investment opportunities existing in the AA is somewhat limited.

Current period investments in Lawrence County are comprised of grants totaling \$141,000 to eight community organizations for CD purposes within the AA. Investments

made during prior evaluation periods that are still outstanding consist of an allocated portion of FirstMerit Corporation's investment in the FirstMerit CDC, represented by an affordable housing project and previously funded portions of Ohio Equity Fund investments.

While FirstMerit's investments are responsive to local needs, they are not innovative or complex.

SERVICE TEST

The bank's performance under the Service Test in Pennsylvania is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Lawrence County AA is good.

Retail Banking Services

Refer to Table 15 for the State of Pennsylvania in appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

FirstMerit's delivery systems are accessible to geographies and individuals of different income levels within the Lawrence County AA. The percentage of offices in low-income geographies exceeds the distribution of the population living in low-income areas, while no offices are located in moderate-income geographies. All low- and moderate-income areas are located in the city of New Castle, and FirstMerit has one of its four offices, or 25 percent, located in one of the low-income geographies. On a combined basis, the low- and moderate-income neighborhoods represent 13 percent of the AAs population. Overall, FirstMerit's delivery systems are accessible to the different income segments of the community.

The level of FirstMerit's office hours and services offered within the AA is good. Office hours and services (including the availability of loan officers) are comparable among all locations regardless of the income level of the geography where the offices are located. Monday through Friday hours are supplemented by Saturday hours at the majority of the banking facilities located in the AA.

FirstMerit offers a checking account product that requires no minimum balance or monthly account fees. This allows customers, including those who are low- and moderate-income, to maintain accounts without regular maintenance fees. The bank also offers a checking account tailored to senior citizens that provides additional benefits with qualifying balances. Additionally, FirstMerit offers no-fee business checking products designed for businesses with minimal and moderate account activity. FirstMerit has an ATM at each of its four offices in the AA, which allows customers to access their accounts outside of regular banking hours.

Alternative delivery systems also include a toll-free telephone banking service and free Internet banking and bill paying service. These services allow customers to obtain deposit and loan account information and rates, transfer funds, pay bills, and apply for various loan products. As specific information is not available on the degree in which low- and moderate-income individuals and geographies are impacted by these services, significant weight cannot be placed on these alternative delivery systems when drawing conclusions for performance in the AA.

Community Development Services

FirstMerit's performance in providing CD services in the Lawrence County AA is good. FirstMerit personnel have taken leadership roles in local organizations that provide services to various members of the community. In addition, members of FirstMerit's staff also participate in organizations that provide education and other services to the AA. Below is a sample of CD initiatives in Lawrence County.

- A bank officer provides financial guidance and serves on the finance committee of the board of a not-for-profit mental health services organization. The organization provides affordable housing and services to its clients who are predominantly low- and moderate-income individuals.
- A bank officer serves on the board, provides financial expertise, and has arranged home-buying seminars in association with a community service organization serving Lawrence County. This non-profit provides services to low- and moderate-income individuals such as working with child-care providers, building homes for low-income families, providing federal grants and loans to help low-income senior citizens, and providing downpayment assistance to prospective homeowners.
- Bank officers and employees have provided technical financial expertise and helped with fundraising activities for several community service organizations that provide services to clients who are primarily low- and moderate-income.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): 1/1/2000 to 12/31/2003 Investment and Service Tests and CD Loans: 7/10/2000 to 5/17/2004	
Financial Institution		Products Reviewed
FirstMerit Bank, N.A. (FirstMerit) Akron, Ohio		Home mortgage loans, small loans to businesses, and CD loans.
Affiliate(s)	Affiliate Relationship	Products Reviewed
FirstMerit Mortgage Corporation FirstMerit Corporation	Bank Subsidiary Parent	Home mortgage loans Qualified Investment in FirstMerit CDC
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
State of Ohio Akron MSA (0080) Canton-Massillon MSA (1320) Cleveland-Lorain-Elyria MSA (1680) Columbus MSA (1840) Mansfield (4800) Toledo MSA (8400) Non-Metropolitan Area: (Ashland, Erie, Huron, Knox, Seneca and Wayne Counties)	Full-scope Full-scope Full-scope Limited-scope Limited-scope Limited-scope Limited-scope	None.
State of Pennsylvania Non-metropolitan Area: (Lawrence County)	Full-scope	

Appendix B: Summary of State Ratings

RATINGS		FirstMerit Bank, N.A.		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
FirstMerit Bank, N.A.	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
State:				
Ohio	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
Pennsylvania	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

Table of Contents

Market Profiles for Areas Receiving Full-Scope Reviews

Akron, Ohio MSA (0080) C-2

Canton-Massillon, Ohio MSA (1320)... C-4

Cleveland-Lorain-Elyria, Ohio MSA (1680)..... C-6

Lawrence County, Pennsylvania (non-metropolitan) C-9

State of Ohio

Akron MSA

Demographic Information for Full-Scope Area: Akron 0080 MSA (1990 Census)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	148	13.51	18.92	46.62	18.92	2.03
Population by Geography	657,575	5.71	16.78	56.72	20.80	0.00
Owner-Occupied Housing by Geography	171,949	3.13	14.12	58.64	24.10	0.00
Businesses by Geography	33,905	5.81	13.35	50.85	29.98	0.00
Farms by Geography	982	2.44	3.77	63.34	30.45	0.00
Family Distribution by Income Level	176,648	19.15	18.39	23.87	38.59	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	66,324	9.88	25.65	55.01	9.46	0.00
Median Family Income (MFI) 1990 = \$35,193 HUD Adjusted MFI for 2002 = \$55,600 Households Below Poverty Level = 12.09%					Median Housing Value 1990 = \$65,925 Unemployment Rate 2002 = 5.4%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census, and 2002 HUD updated MFI.

Demographic Information for Full-Scope Area: Akron 0080 MSA (2000 Census)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	166	11.45	22.89	43.98	21.69	0.00
Population by Geography	694,960	6.29	21.45	48.11	24.15	0.00
Owner-Occupied Housing by Geography	193,221	2.76	18.38	51.56	27.30	0.00
Businesses by Geography	36,421	9.28	14.73	43.19	32.79	0.00
Farms by Geography	1,052	3.23	6.84	60.08	29.85	0.00
Family Distribution by Income Level	184,471	18.96	18.42	23.14	39.48	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	68,963	9.91	30.79	47.53	11.77	0.00
Median Family Income (MFI) 2000 = \$52,321 HUD Adjusted MFI for 2003 = \$60,300 Households Below Poverty Level = 9.91%					Median Housing Value 2000 = \$115,818 Unemployment Rate 2003 = 5.7%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2003 HUD updated MFI.

The Akron AA consists of the entire Akron, Ohio MSA (0080), and is comprised of Portage and Summit Counties. Akron is a principal market for FirstMerit, with the bank and holding company headquartered there. With 37 branches within the area, approximately 32 percent of the bank's Ohio deposits and 25 percent of its Ohio-based reported loans come from this AA.

June 30, 2003 FDIC deposit data reflects that FirstMerit is ranked number one in size within the area with a 24 percent share of the insured deposit market. The next largest competitors are Bank One, N.A. (14 percent) and National City Bank (13 percent). Competition is strong as there are 27 insured institutions operating 227 offices in this two-county area. According to aggregate HMDA data, over 350 lenders originated home mortgage loans in the AA during 2002.

Local unemployment levels increased during the evaluation period, and averaged 5.7 percent during 2003. This was somewhat lower than the 6.1 percent statewide level for Ohio. Approximately 10 percent of households are below the poverty level, with 44 percent of low-income households below the poverty level. It is especially difficult for this segment of the population to afford and maintain a home.

A portion of the City of Akron, including the downtown section, was designated as a federal Enterprise Community in 1994. The Enterprise Community program supports new business startup, business expansion, job training, and neighborhood development. Federal funds were used, in part, to establish various programs, including a revolving loan program for small to midsize companies, an industrial incubator, a micro-loan program, and family loan targeted to low-income families.

Assessment Area Needs

There have been opportunities to make CD loans, qualified investments, and provide CD services within the MSA. The competition for involvement in larger projects is high as a large number of financial institutions and multi-bank holding companies operate in the AA, as discussed above. Community resources and opportunities exist where banks can participate in partnerships to address the credit and community development needs. There are various community development organizations within the local communities that have the capacity to help address community needs, as well as local government programs.

Our evaluation took into consideration information derived from members of the community. We met with four organizations focusing attention on economic development, affordable housing and small business initiatives. The primary need identified is for additional quality affordable housing. Contacts reported that home rehabilitation loans, especially those with relaxed rates and underwriting standards are needed. Affordable home financing is needed, including additional programs that offer low or no fees, use relaxed underwriting, and participate in closing cost grants and similar incentives. Needs also include additional economic development for creating job opportunities, additional technical assistance to support affordable housing and economic development projects, and a need for more predatory lending awareness education and ways to guard against it.

Canton MSA

Demographic Information for Full-Scope Area: Canton 1320 MSA (1990 Census)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	64	6.25	18.75	59.38	15.63	0.00
Population by Geography	326,198	4.01	14.80	57.27	23.93	0.00
Owner-Occupied Housing by Geography	87,263	2.11	12.90	60.26	24.72	0.00
Businesses by Geography	14,982	6.57	10.04	52.69	30.70	0.00
Farms by Geography	588	1.70	2.72	76.53	19.05	0.00
Family Distribution by Income Level	90,917	17.31	17.72	25.02	39.95	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	31,847	7.28	22.94	56.15	13.63	0.00
Median Family Income (MFI) 1990 = \$32,485 HUD Adjusted MFI for 2002 = \$51,900 Households Below Poverty Level = 10.90%			Median Housing Value 1990 = Unemployment Rate 2002 =			\$57,917 5.5%

(*) The NA category consists of geographies that have not been assigned an income classification.
Sources: 1990 U.S. Census 2002 HUD updated MFI, Ohio Bureau of Labor Market Information.

Demographic Information for Full-Scope Area: Canton 1320 MSA (2000 Census)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	70	4.29	22.86	57.14	15.71	0.00
Population by Geography	336,420	1.94	16.78	58.74	22.53	0.00
Owner-Occupied Housing by Geography	96,255	1.02	14.39	61.36	23.23	0.00
Businesses by Geography	15,890	3.86	15.81	52.57	27.76	0.00
Farms by Geography	628	0.64	8.60	65.76	25.00	0.00
Family Distribution by Income Level	92,132	16.86	18.75	23.69	40.70	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	32,812	3.98	25.30	57.38	13.35	0.00
Median Family Income (MFI) 2000 = \$47,169 HUD Adjusted MFI for 2003 = \$53,200 Households Below Poverty Level = 8.93%			Median Housing Value 2000 = Unemployment Rate 2003 =			\$102,567 6.7%

(*) The NA category consists of geographies that have not been assigned an income classification.
Sources: 2000 U.S. Census, 2003 HUD updated MFI, Ohio Bureau of Labor Market Information.

The Canton AA is a portion of the Canton-Massillon Ohio MSA (1320). It is comprised of the central and western portions of Stark County where the bank has a presence, including the City of Canton and surrounding metropolitan area. FirstMerit operates 16 branches in this AA. Bank management determined that its branch structure is not sufficient to address the needs of the entire MSA. This is the bank's third largest AA based on deposits and loans, with approximately 17 percent of the bank's Ohio deposits and 16 percent of reported loans coming from this AA.

According to June 30, 2003 FDIC deposit data, FirstMerit is ranked number one in size with a 24 percent share of the insured deposit market within Stark County. The next largest competitors are Unizan Bank, N.A. (19 percent), and Charter One Bank, N.A. (15 percent). Competition is strong in the area as there are 19 insured institutions operating 115 offices in a county with a population of 378 thousand. According to aggregate HMDA data, nearly 300 lenders reported home mortgage loan originations in the AA during 2002.

Local unemployment levels increased during the evaluation period, and averaged 6.7 percent during 2003. This was somewhat higher than the 6.1 percent statewide level for Ohio. Approximately 9 percent of households are below the poverty level, with 43 percent of low-income households below the poverty level. It is especially difficult for this segment of the population to afford and maintain a home.

Assessment Area Needs

There has been a moderate level of opportunities to make CD loans, qualified investments, and provide CD services within the MSA. The competition for involvement in larger projects is high as a large number of financial institutions and multi-bank holding companies operate in the AA. Community resources and opportunities exist where banks can participate in city and county housing and economic programs, and partner with nonprofit housing development and economic organizations to address the credit and CD needs.

Our evaluation took into consideration information derived from members of the community. We met with two community organizations that focus on addressing the affordable housing, community service, and economic development needs of the area. There is a continuing need for increased availability of affordable housing, especially under programs that allow for relaxed underwriting, or an alternative lease-purchase finance program. Additional consumer education to raise predatory lending awareness and ways to guard against it is needed. Also, community organizations need local participation, including financial institutions, to provide technical support for community development projects.

Cleveland MSA

Demographic Information for Full-Scope Area: Cleveland 1680 MSA (1990 Census)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	719	15.99	17.11	41.31	22.67	2.92
Population by Geography	2,202,069	9.82	15.71	47.87	26.53	0.07
Owner-Occupied Housing by Geography	561,620	4.81	12.00	52.32	30.86	0.00
Businesses by Geography	110,233	7.60	10.87	44.06	34.39	3.08
Farms by Geography	3,076	1.46	7.44	55.82	35.14	0.13
Family Distribution by Income Level	590,382	20.09	17.34	24.07	38.51	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	220,928	17.94	23.74	45.17	13.15	0.00
Median Family Income (MFI) 1990 = \$36,500 HUD Adjusted MFI for 2002 = \$60,000 Households Below Poverty Level = 11.97%						Median Housing Value 1990 = \$72,437 Unemployment Rate 2002 = 6.5%

(*) The NA category consists of geographies that have not been assigned an income classification.
Sources: 1990 U.S. Census, 2002 HUD updated MFI, Ohio Bureau of Labor Market Information.

Demographic Information for Full-Scope Area: Cleveland 1680 MSA (2000 Census)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	718	15.04	20.33	39.42	23.40	1.81
Population by Geography	2,250,871	8.83	17.27	45.11	28.77	0.03
Owner-Occupied Housing by Geography	610,065	4.34	12.72	49.60	33.34	0.00
Businesses by Geography	119,898	7.30	14.85	42.16	34.89	0.80
Farms by Geography	3,316	1.45	5.70	54.89	37.85	0.12
Family Distribution by Income Level	590,866	20.05	17.93	22.25	39.77	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	224,410	16.25	25.58	43.14	15.03	0.00
Median Family Income (MFI) 2000 = \$52,047 HUD Adjusted MFI for 2003 = \$59,900 Households Below Poverty Level = 10.63%						Median Housing Value 2000 = \$122,593 Unemployment Rate 2003 = 6.7%

(*) The NA category consists of geographies that have not been assigned an income classification.
Sources: 2000 U.S. Census, 2003 HUD updated MFI, Ohio Bureau of Labor Market Information.

FirstMerit's Cleveland AA consists of the Cleveland-Lorain-Elyria, Ohio MSA (1680), which, based on population, is the largest MSA in the state. This area is comprised of Ashtabula, Cuyahoga, Geauga, Lake, Lorain, and Medina Counties. This is a primary market for FirstMerit, with approximately 37 percent of the bank's Ohio deposits and 40 percent of reportable loans based in this AA. With 68 offices, this area has FirstMerit's largest branch network.

June 30, 2003 FDIC data reflects that FirstMerit is ranked seventh in the MSA in terms of deposits with a market share of four percent. FirstMerit's presence varies greatly among various counties within the AA, ranging from a number one ranking and 29 percent market share in Lorain and Medina counties, with only a one percent share of the Cuyahoga County deposit market. FirstMerit's presence is particularly small within the City of Cleveland with only four offices located there. Cleveland is the headquarters for Key Bank, N.A., National City Bank, and Charter One Bank, N.A., which are all much larger regional institutions. Competition is strong in the AA as there are 51 insured institutions operating over 750 offices in this six-county area. According to aggregate HMDA data, 475 lenders reported home mortgage loan originations in the AA during 2002. Competition for community development loans, investments and services in the MSA is particularly high with the large multi-bank holding companies operating in the market.

Local unemployment levels increased during the evaluation period, and averaged 6.7 percent during 2003 for all six counties combined. This is somewhat higher than the 6.1 percent statewide level for Ohio. Approximately 10 percent of households are below the poverty level, with 46 percent of low-income households below the poverty level. It is especially difficult for this segment of the population to afford and maintain a home. The City of Cleveland houses a disproportionate share of the area's below-poverty population. While 21 percent of the MSA's population resides in Cleveland, 49 percent of the MSA's below-poverty households are in Cleveland.

Assessment Area Needs

There is good opportunity to make CD loans, qualified investments, and provide CD services within the MSA. Competition for involvement in larger projects is high as a large number of financial institutions and multi-bank holding companies operate in the AA, as discussed above. A high level of community resources and opportunities for partnerships exist, especially in the City of Cleveland where a large number of sophisticated community-based organizations that are engaged in a wide range of activities from industrial retention and development, to housing rehabilitation, to new home construction. There is sufficient capacity and expertise throughout most the community to help address the opportunities presented.

Our evaluation took into consideration information derived from members of the community. We met with three local organizations that administer affordable housing, community service, and economic development programs. Consideration was also given to other community contacts made by the OCC during the past year as well. Affordable housing is a primary need. Financing programs with flexible terms are needed for home purchase, construction, and rehabilitation. There is also a need for additional monetary and technical support for development initiatives.

State of Pennsylvania

Lawrence County (non-metropolitan)

Demographic Information for Full-Scope Area: Lawrence County (1990 Census)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	28	3.57	25.00	64.29	7.14	0.00
Population by Geography	96,246	2.61	15.39	72.90	9.11	0.00
Owner-Occupied Housing by Geography	27,671	1.20	12.78	76.93	9.10	0.00
Businesses by Geography	5,484	3.08	28.36	52.66	15.90	0.00
Farms by Geography	192	0.52	2.08	81.77	15.63	0.00
Family Distribution by Income Level	26,912	19.76	20.71	24.11	35.41	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	10,893	3.51	21.00	70.65	4.85	0.00
Median Family Income (MFI) 1990 = \$28,934 HUD Adjusted MFI for 2002 = \$41,100 Households Below Poverty Level = 13.92%			Median Housing Value 1990 = \$42,936 Unemployment Rate 2002 = 6.9%			

(*) The NA category consists of geographies that have not been assigned an income classification.
Sources: 1990 U.S. Census, 2002 HUD updated MFI, Pennsylvania Labor Market Information.

Demographic Information for Full-Scope Area: Lawrence County (2000 Census)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	27	7.41	11.11	70.37	11.11	0.00
Population by Geography	94,643	4.36	9.07	68.83	17.74	0.00
Owner-Occupied Housing by Geography	28,660	2.17	6.94	73.60	17.29	0.00
Businesses by Geography	5,345	10.74	11.82	56.80	20.64	0.00
Farms by Geography	185	0.54	3.24	76.76	19.46	0.00
Family Distribution by Income Level	26,026	17.97	19.33	23.18	39.51	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	9,709	7.17	12.39	67.77	12.67	0.00
Median Family Income (MFI) 2000 = \$41,549 HUD Adjusted MFI for 2003 = \$47,400 Households Below Poverty Level = 12.18%			Median Housing Value 2000 = \$73,456 Unemployment Rate 2003 = 6.6%			

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 U.S. Census, and 2003 HUD updated MFI, Pennsylvania Labor Market Information.

FirstMerit's Lawrence County AA consists of the entire county of Lawrence in western Pennsylvania. This non-MSA county is FirstMerit's only presence in the state. While all of FirstMerit's deposits and reportable loans in Pennsylvania are from this AA, this is a moderate sized market for the bank. Four branches serve this area, and approximately 12 percent of the bank's deposits and 8 percent of reportable loans come from this AA.

According to June 30, 2003 FDIC deposit data FirstMerit is ranked first in size with a 44 percent share of the insured deposit market within Lawrence County. Sky Bank (15 percent) and ESB Bank, FSB (10 percent) are the next largest deposit holders. There are a total of 9 financial institutions operating 34 offices in this county with a population less than 100,000. According to aggregate HMDA data, 170 lenders originated home mortgage loans in the AA during 2002.

Local unemployment levels increased during the evaluation period, and averaged 6.6 percent during 2003. This was somewhat higher than the 5.6 percent statewide level for Pennsylvania. Approximately 12 percent of households are below the poverty level, with 49 percent of low-income households below the poverty level. It is especially difficult for this segment of the population to afford and maintain a home.

Assessment Area Needs

Opportunities to make CD loans, qualified investments, and provide CD services within the area are somewhat limited. While initiatives have been made, there are relatively few community organizations operating in the area compared to metropolitan areas. Our evaluation took into consideration information derived from members of the community. We contacted three local organizations and one regional organization focusing on affordable housing, economic development, and business development. Additional affordable housing financing has been a need, and there is a need for greater technical support and fund raising to support community services. One contact noted that the level of support from financial institutions in general has decreased as local banks have been acquired by out-of-area holding companies.

Appendix D: Tables of Performance Data

Table of Contents

CONTENT OF STANDARDIZED TABLES D-2

TABLES OF PERFORMANCE DATA D-5

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

Table 1. Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As ___ .12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.

Table 1. Other Products - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.

Table 2. Geographic Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans - See Table 2.

Table 5. Geographic Distribution of Multifamily Loans - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income

geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6.** Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7.** **Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8.** **Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9.** **Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10.** **Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11.** **Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12.** **Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to

\$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO						Evaluation Period: January 1, 2000 TO December 31, 2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Akron MSA	25.94%	5,598	498,257	2,643	435,297	2	500	22	12,184	8,265	946,238	32.23%
Canton MSA	15.86%	3,826	362,312	1,197	220,183	3	68	27	5,014	5,053	587,577	16.94%
Cleveland MSA	39.74%	8,102	793,452	4,503	790,730	9	711	44	14,666	12,658	1,599,599	37.39%
Limited Review												
Columbus MSA	1.44%	308	34,038	149	25,873	2	282	0	0	459	60,193	1.82%
Mansfield MSA	4.56%	1,305	102,471	139	16,160	8	420	1	405	1,453	119,456	2.95%
Toledo MSA	0.19%	41	2,558	6	317	12	978	0	0	59	3,853	0.31%
Ohio Non-MSA Areas	12.27%	3,322	301,877	571	100,491	17	2,077	0	0	3,910	404,445	8.36%

LENDING VOLUME		Geography: PENNSYLVANIA						Evaluation Period: January 1, 2000 TO December 31, 2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Lawrence County	100.00%	664	49,639	177	21,406	0	0	4	229	845	71,274	100.00

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.
 ** The evaluation period for Community Development Loans is July 10, 2000 to December 31, 2002.
 *** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Lending Volume

LENDING VOLUME		Geography: OHIO				Evaluation Period: January 1, 2003 TO December 31, 2003						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Akron MSA	23.66%	3,024	297,093	781	153,601	1	75	10	5,661	3,816	456,430	32.23%
Canton MSA	15.34%	2,129	218,818	328	74,937	0	0	18	9,611	2,475	303,366	16.94%
Cleveland MSA	39.12%	4,984	533,289	1,296	277,612	2	80	29	15,184	6,311	826,165	37.39%
Limited Review:												
Columbus MSA	1.24%	186	20,284	12	1,554	0	0	2	160	200	21,998	1.82%
Mansfield MSA	4.81%	729	58,994	41	5,724	5	255	0	0	775	64,973	2.95%
Toledo MSA	0.24%	37	3,076	0	0	2	180	0	0	39	3,256	0.31%
Ohio Non-MSA Areas	15.59%	2,351	215,693	160	33,341	4	945	0	0	2,515	249,979	8.36%
Ohio CD Loans Outside of FirstMerit AAs	N/A	0	0	0	0	0	0	2	6,325	2	6,325	N/A

LENDING VOLUME		Geography: PENNSYLVANIA				Evaluation Period: January 1, 2003 TO December 31, 2003						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Lawrence County	100.00%	372	28,625	20	3,746	0	0	2	120	394	32,491	100.00

* Loan Data as of December 31, 2003. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is January 1, 2003 to May 17, 2004.

*** Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: OHIO				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Akron MSA	1,456	22.54	3.13	3.02	14.12	14.08	58.64	57.35	24.10	25.55	3.83	1.87	4.63	4.01	3.31	
Canton MSA	1,252	19.38	2.11	0.40	12.90	12.94	60.26	52.40	24.72	34.27	6.76	2.30	8.50	6.21	7.33	
Cleveland MSA	2,174	33.66	4.81	1.47	12.00	14.35	52.32	54.97	30.86	28.98	1.54	0.72	1.96	1.58	1.46	
Limited Review:																
Columbus MSA	115	1.78	0.00	0.00	4.37	2.61	40.67	74.78	54.96	22.61	0.28	0.00	0.35	0.68	0.12	
Mansfield MSA	445	6.89	1.07	0.67	14.60	9.89	58.10	56.40	26.23	33.03	5.41	0.00	3.30	5.37	6.36	
Toledo MSA	17	0.26	0.00	0.00	2.98	5.88	69.87	58.82	27.15	35.29	0.17	0.00	0.00	0.07	0.35	
Ohio Non-MSA Areas	1,000	15.48	0.00	0.00	5.61	3.10	69.21	64.40	25.18	32.50	6.26	0.00	5.79	5.63	7.85	

Geographic Distribution: HOME PURCHASE			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Lawrence County	364	100.00	1.20	1.65	12.78	16.76	76.93	64.56	9.10	17.03	14.71	14.29	31.30	11.47	16.99	

* Based on 2002 Peer Mortgage Data.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: OHIO				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Akron MSA	508	21.89	2.76	1.38	18.38	15.16	51.56	59.06	27.30	24.41	0.00	0.00	0.00	0.00	0.00	
Canton MSA	379	16.33	1.02	0.00	14.39	8.44	61.36	64.38	23.23	27.18	0.00	0.00	0.00	0.00	0.00	
Cleveland MSA	805	34.68	4.34	1.12	12.72	8.57	49.60	54.66	33.34	35.65	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Columbus MSA	27	1.16	0.00	0.00	2.94	0.00	49.95	88.89	47.11	11.11	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	137	5.90	0.12	0.00	12.15	6.57	59.56	48.18	28.17	45.26	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	17	0.73	0.02	0.00	1.61	0.00	63.81	82.35	34.56	17.65	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA Areas	448	19.30	0.00	0.00	4.37	1.79	74.15	86.61	21.48	11.61	0.00	0.00	0.00	0.00	0.00	

Geographic Distribution: HOME PURCHASE			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Lawrence County	129	100.00	2.17	3.88	6.94	17.05	73.60	56.59	17.29	22.48	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (Not currently available).

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Akron MSA	1,115	32.19	3.13	6.19	14.12	31.39	58.64	51.12	24.10	11.30	18.06	9.80	28.76	15.32	17.36	
Canton MSA	415	11.98	2.11	1.20	12.90	15.90	60.26	63.61	24.72	19.28	20.59	5.56	19.27	21.39	21.43	
Cleveland MSA	1,644	47.46	4.81	4.20	12.00	21.29	52.32	59.73	30.86	14.72	8.73	5.25	10.99	9.08	6.84	
Limited Review:																
Columbus MSA	38	1.10	0.00	0.00	4.37	5.26	40.67	68.42	54.96	26.32	1.36	0.00	0.00	2.32	0.66	
Mansfield MSA	62	1.79	1.07	3.23	14.60	17.74	58.10	50.00	26.23	29.03	2.76	33.33	2.63	2.34	3.48	
Toledo MSA	10	0.29	0.00	0.00	2.98	0.00	69.87	100.00	27.15	0.00	1.52	0.00	0.00	2.09	0.00	
Ohio Non-MSA Areas	180	5.20	0.00	0.00	5.61	1.67	69.21	69.44	25.18	28.89	10.39	0.00	2.94	8.53	18.06	

Geographic Distribution: HOME IMPROVEMENT			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Lawrence County	73	100.00	1.20	1.37	12.78	8.22	76.93	79.45	9.10	10.96	5.72	0.00	5.66	4.71	15.63	

* Based on 2002 Peer Mortgage Data.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Akron MSA	360	29.41	2.76	4.17	18.38	29.17	51.56	54.72	27.30	11.94	0.00	0.00	0.00	0.00	0.00	
Canton MSA	149	12.17	1.02	0.67	14.39	15.44	61.36	64.43	23.23	19.46	0.00	0.00	0.00	0.00	0.00	
Cleveland MSA	579	47.30	4.34	3.97	12.72	13.64	49.60	59.24	33.34	23.14	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Columbus MSA	4	0.33	0.00	0.00	2.94	25.00	49.95	25.00	47.11	50.00	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	47	3.84	0.12	0.00	12.15	27.66	59.56	44.68	28.17	27.66	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	5	0.41	0.02	0.00	1.61	0.00	63.81	100.00	34.56	0.00	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA Areas	80	6.54	0.00	0.00	4.37	2.50	74.15	82.50	21.48	15.00	0.00	0.00	0.00	0.00	0.00	

Geographic Distribution: HOME IMPROVEMENT			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Lawrence County	23	100.00	2.17	0.00	6.94	21.74	73.60	69.57	17.29	8.70	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (Not currently available).

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Akron MSA	3,009	24.07	3.13	4.62	14.12	14.66	58.64	54.74	24.10	25.99	5.04	10.78	7.32	4.65	4.39	
Canton MSA	2,153	17.22	2.11	1.21	12.90	7.71	60.26	52.16	24.72	38.92	6.91	8.81	5.66	6.18	8.44	
Cleveland MSA	4,240	33.91	4.81	1.32	12.00	9.83	52.32	55.92	30.86	32.88	2.47	0.71	2.39	2.74	2.32	
Limited Review:																
Columbus MSA	154	1.23	0.00	0.00	4.37	2.60	40.67	77.27	54.96	20.13	0.41	0.00	0.34	1.09	0.17	
Mansfield MSA	796	6.37	1.07	0.75	14.60	6.53	58.10	49.50	26.23	43.22	6.50	11.43	2.79	5.53	9.26	
Toledo MSA	13	0.10	0.00	0.00	2.98	0.00	69.87	100.00	27.15	0.00	0.09	0.00	0.00	0.16	0.00	
Ohio Non-MSA Areas	2,137	17.09	0.00	0.00	5.61	2.25	69.21	69.44	25.18	28.31	8.14	0.00	4.08	7.97	9.30	

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Lawrence County	227	100.00	1.20	0.88	12.78	3.08	76.93	77.09	9.10	18.94	6.23	0.00	2.04	6.53	8.03	

* Based on 2002 Peer Mortgage Data.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Akron MSA	2,145	21.73	2.76	2.28	18.38	12.63	51.56	55.24	27.30	29.84	0.00	0.00	0.00	0.00	0.00	
Canton MSA	1,600	16.21	1.02	0.00	14.39	4.25	61.36	59.44	23.23	36.31	0.00	0.00	0.00	0.00	0.00	
Cleveland MSA	3,590	36.36	4.34	0.89	12.72	5.82	49.60	52.79	33.34	40.50	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Columbus MSA	155	1.57	0.00	0.00	2.94	3.23	49.95	73.55	47.11	23.23	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	545	5.52	0.12	0.00	12.15	5.50	59.56	51.01	28.17	43.49	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	15	0.15	0.02	0.00	1.61	0.00	63.81	86.67	34.56	13.33	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA Areas	1,823	18.46	0.00	0.00	4.37	1.81	74.15	86.18	21.48	12.01	0.00	0.00	0.00	0.00	0.00	

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Lawrence County	220	100.00	2.17	0.00	6.94	5.45	73.60	63.64	17.29	30.91	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (Not currently available).

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: OHIO				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Akron MSA	18	23.38	10.37	22.22	18.36	33.33	53.54	33.33	17.74	11.11	0.00	0.00	0.00	0.00	0.00	
Canton MSA	6	7.79	11.74	0.00	11.03	16.67	40.99	50.00	36.24	33.33	3.23	0.00	0.00	0.00	10.00	
Cleveland MSA	44	57.14	16.61	13.64	13.86	25.00	48.48	52.27	20.97	9.09	2.13	0.00	6.67	1.25	0.00	
Limited Review:																
Columbus MSA	1	1.30	0.00	0.00	19.87	0.00	29.27	100.00	50.86	0.00	2.78	0.00	0.00	11.11	0.00	
Mansfield MSA	2	2.60	3.72	50.00	13.26	0.00	64.09	50.00	18.92	0.00	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	1	1.3	0.00	0.00	2.36	0.00	66.93	100.00	29.08	0.00	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA Areas	5	6.49	0.00	0.00	12.77	0.00	58.18	60.00	29.05	40.00	7.69	0.00	0.00	5.00	16.67	

Geographic Distribution: MULTIFAMILY			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Lawrence County	0	0.00	15.91	0.00	37.35	0.00	42.00	0.00	4.73	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: OHIO				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Akron MSA	11	50.00	12.03	27.27	24.76	18.18	44.88	9.09	18.33	45.45	0.00	0.00	0.00	0.00	0.00	
Canton MSA	1	4.55	4.61	100.00	16.61	0.00	47.12	0.00	31.67	0.00	0.00	0.00	0.00	0.00	0.00	
Cleveland MSA	10	45.45	11.59	0.00	26.56	30.00	43.76	60.00	18.08	10.00	0.00	0.00	00.0	0.00	0.00	
Limited Review:																
Columbus MSA	0	0.00	0.00	0.00	15.62	0.00	55.43	0.00	28.96	0.00	0.00	0.00	00.0	0.00	0.00	
Mansfield MSA	0	0.00	0.82	0.00	24.29	0.00	50.82	0.00	24.06	0.00	0.00	0.00	00.0	0.00	0.00	
Toledo MSA	0	0.00	1.99	0.00	16.79	0.00	46.79	0.00	34.43	0.00	0.00	0.00	00.0	0.00	0.00	
Ohio Non-MSA Areas	0	0.00	0.00	0.00	12.04	0.00	69.33	0.00	18.63	0.00	0.00	0.00	00.0	0.00	0.00	

Geographic Distribution: MULTIFAMILY			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Lawrence County	0	0.00	19.59	0.00	26.45	0.00	28.99	0.00	24.97	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (Not currently available).

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: OHIO		Evaluation Period January 1, 2000 TO December 31, 2002				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total*	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																		
Akron MSA	2,643	28.70	5.81	10.14	13.35	15.32	50.85	47.45	29.98	27.09	6.12	9.96	7.44	5.89	6.04			
Canton MSA	1,197	13.00	6.57	5.43	10.04	7.69	52.69	52.38	30.70	34.50	5.44	6.68	4.56	5.63	5.93			
Cleveland MSA	4,503	48.90	7.60	4.87	10.87	9.01	44.06	51.64	34.39	34.48	3.31	2.28	3.37	3.66	3.32			
Limited Review:																		
Columbus MSA	149	1.62	0.00	0.00	4.64	2.68	34.06	47.65	61.29	49.66	0.45	0.40	0.23	0.39	0.62			
Mansfield MSA	139	1.51	4.60	4.32	18.37	20.86	55.31	39.57	21.73	35.25	1.53	2.48	1.76	1.23	2.15			
Toledo MSA	6	0.07	0.00	0.00	2.28	0.00	60.57	100.00	35.76	0.00	0.00	0.00	0.00	0.00	0.00			
Ohio Non-MSA Area	571	6.20	0.00	0.00	7.16	4.38	67.55	65.67	25.29	29.95	1.77	0.00	1.45	1.73	2.41			

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: PENNSYLVANIA		Evaluation Period January 1, 2000 TO December 31, 2002				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography							
	#	% of Total	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																		
Lawrence County	177	100.00	3.08	18.64	28.36	25.99	52.66	40.68	15.90	14.69	2.27	7.81	1.93	1.89	4.35			

* Based on 2002 Peer Small Business Data.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet 2002.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: OHIO								Evaluation Period January 1, 2003 TO December 31, 2003					
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total*	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid
Full Review:																
Akron MSA	781	29.83	9.28	13.32	14.73	17.67	43.19	43.92	32.79	25.10	0.00	0.00	0.00	0.00	0.00	
Canton MSA	328	12.53	3.86	6.40	15.81	11.28	52.57	55.18	27.76	27.13	0.00	0.00	0.00	0.00	0.00	
Cleveland MSA	1,296	49.50	7.30	4.28	14.85	11.82	42.16	46.58	34.89	37.33	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Columbus MSA	12	0.46	0.00	0.00	4.91	8.33	50.13	50.00	44.96	41.67	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	41	1.57	2.24	12.20	17.19	21.95	53.13	21.95	27.44	43.90	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	0	0.00	1.60	0.00	4.16	0.00	55.91	0.00	38.32	0.00	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA Area	160	6.11	0.00	0.00	7.86	0.63	72.98	80.00	19.16	19.38	0.00	0.00	0.00	0.00	0.00	

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: PENNSYLVANIA								Evaluation Period January 1, 2003 TO December 31, 2003					
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Lawrence County	20	100.00	10.74	15.00	11.82	15.00	56.80	50.00	20.64	20.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Small Business Data (Not currently available).

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet 2003.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: OHIO				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Akron MSA	2	3.77	2.44	0.00	3.77	0.00	63.34	0.00	30.45	100.00	4.35	0.00	0.00	0.00	33.33	
Canton MSA	3	5.66	1.70	0.00	2.72	0.00	76.53	100.00	19.05	0.00	3.70	0.00	0.00	4.55	0.00	
Cleveland MSA	9	16.98	1.46	0.00	7.44	0.00	55.82	77.78	35.14	22.22	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Columbus MSA	2	3.77	0.00	0.00	2.26	0.00	64.37	100.00	33.38	0.00	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	8	15.09	0.13	0.00	4.42	0.00	74.59	75.00	20.86	25.00	1.85	0.00	0.00	2.33	0.00	
Toledo MSA	12	22.64	0.00	0.00	1.64	0.00	89.27	100.00	9.09	0.00	0.58	0.00	0.00	0.62	0.00	
Ohio Non-MSA Area	17	32.08	0.00	0.00	2.20	0.00	82.49	70.59	15.31	29.41	0.19	0.00	0.00	0.00	1.41	

Geographic Distribution: SMALL LOANS TO FARMS			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Lawrence County	0	0.00	0.52	0.00	2.08	0.00	81.77	0.00	15.63	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Small Business Data.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet 2002.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: OHIO				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Akron MSA	1	7.14	3.23	0.00	6.84	0.00	60.08	100.00	29.85	0.00	0.00	0.00	0.00	0.00	0.00	
Canton MSA	0	0.00	0.64	0.00	8.60	0.00	65.76	0.00	25.00	0.00	0.00	0.00	0.00	0.00	0.00	
Cleveland MSA	2	14.29	1.45	0.00	5.70	0.00	54.89	50.00	37.85	50.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Columbus MSA	0	0.00	0.00	0.00	1.77	0.00	70.87	0.00	27.36	0.00	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	5	35.71	0.00	0.00	1.83	0.00	75.98	60.00	22.19	40.00	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	2	14.29	0.00	0.00	0.19	0.00	86.11	100.00	13.70	0.00	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA Area	4	28.57	0.00	0.00	0.55	0.00	83.67	100.00	15.79	0.00	0.00	0.00	0.00	0.00	0.00	

Geographic Distribution: SMALL LOANS TO FARMS			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Lawrence County	0	0.00	0.54	0.00	3.24	0.00	76.76	0.00	19.46	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Small Business Data: (Not currently available).

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet 2003.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: OHIO				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****						
Full Review:																
Akron MSA	1,456	22.54	19.15	14.86	18.39	27.78	23.87	23.13	38.59	34.24	4.48	7.16	4.62	3.82	4.24	
Canton MSA	1,252	19.38	17.31	14.72	17.72	25.18	25.02	24.05	39.95	36.04	7.69	10.90	7.46	6.48	7.92	
Cleveland MSA	2,174	33.66	20.09	16.55	17.34	29.88	24.07	21.77	38.51	31.79	1.85	2.68	1.72	1.46	2.01	
Limited Review:																
Columbus MSA	115	1.78	10.65	14.78	14.72	22.61	23.69	25.22	50.94	37.39	0.32	0.74	0.52	0.36	0.17	
Mansfield MSA	445	6.89	18.40	12.27	18.63	32.95	25.19	26.59	37.78	28.18	5.71	5.24	6.04	6.11	5.22	
Toledo MSA	17	0.26	14.91	11.76	17.73	23.53	25.06	41.18	42.30	23.53	0.19	0.00	0.00	0.29	0.25	
Ohio Non-MSA Areas	1,000	15.48	15.38	8.27	17.98	27.14	24.39	28.66	42.25	35.92	7.07	7.61	8.07	7.23	6.14	

Borrower Distribution: HOME PURCHASE			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****						
Full Review:																
Lawrence County	364	100.00	19.76	14.48	20.71	29.53	24.11	25.91	35.41	30.08	17.63	33.73	23.50	16.18	11.21	

* Based on 2002 Peer Mortgage Data.

** As a percentage of loans with borrower income information available. No information was available for 1.5% of Ohio and 1.37% of Pennsylvania loans originated and purchased by FirstMerit.

*** Percentage of Families is based on the 1990 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: OHIO				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****						
Full Review:																
Akron MSA	508	21.89	18.96	19.43	18.42	23.72	23.14	28.02	39.48	28.83	0.00	0.00	0.00	0.00	0.00	
Canton MSA	379	16.33	16.86	14.13	18.75	28.80	23.69	25.07	40.70	32.00	0.00	0.00	0.00	0.00	0.00	
Cleveland MSA	805	34.68	20.05	16.88	17.93	27.96	22.25	24.06	39.77	31.11	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Columbus MSA	27	1.16	11.29	14.81	13.59	14.81	21.30	48.15	53.82	22.22	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	137	5.90	17.66	17.78	19.32	27.41	23.95	32.59	39.08	22.22	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	17	0.73	13.62	0.00	16.08	47.06	24.75	11.76	45.54	41.18	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA Areas	448	19.30	15.03	10.59	18.37	27.70	24.53	27.93	42.07	33.78	0.00	0.00	0.00	0.00	0.00	

Borrower Distribution: HOME PURCHASE			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****						
Full Review:																
Lawrence County	129	100.00	17.97	24.81	19.33	24.03	23.18	22.48	39.51	28.68	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (Not currently available).

** As a percentage of loans with borrower income information available. No information was available for 1.72% of Ohio and 0.0% of Pennsylvania loans originated and purchased by FirstMerit.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****						
Full Review:																
Akron MSA	1,115	32.19	19.15	20.02	18.39	30.30	23.87	28.49	38.59	21.19	19.30	25.12	20.75	19.53	14.57	
Canton MSA	415	11.98	17.31	16.91	17.72	28.26	25.02	28.50	39.95	26.33	22.41	26.15	23.21	23.73	18.99	
Cleveland MSA	1,644	47.46	20.09	20.37	17.34	29.27	24.07	27.62	38.51	22.74	9.35	12.07	10.23	8.90	7.24	
Limited Review:																
Columbus MSA	38	1.10	10.65	2.63	14.72	23.68	23.69	26.32	50.94	47.37	1.54	0.00	0.00	2.56	1.96	
Mansfield MSA	62	1.79	18.40	19.67	18.63	22.95	25.19	22.95	37.78	34.43	2.83	1.03	3.55	1.63	4.49	
Toledo MSA	10	0.29	14.91	10.00	17.73	50.00	25.06	10.00	42.30	30.00	1.63	0.00	2.99	1.41	1.18	
Ohio Non-MSA Areas	180	5.20	15.38	15.64	17.98	24.58	24.39	32.40	42.25	27.37	11.11	15.07	12.00	11.48	8.80	

Borrower Distribution: HOME IMPROVEMENT			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****						
Full Review:																
Lawrence County	73	100.00	19.76	10.96	20.71	12.33	24.11	20.55	35.41	56.16	6.36	5.88	6.12	5.94	6.85	

* Based on 2002 Peer Mortgage Data.

** As a percentage of loans with borrower income information available. No information was available for 0.38% of Ohio and 0.0% of Pennsylvania loans originated and purchased by FirstMerit.

*** Percentage of Families is based on the 1990 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****						
Full Review:																
Akron MSA	360	29.41	18.96	22.63	18.42	24.02	23.14	26.54	39.48	26.82	0.00	0.00	0.00	0.00	0.00	
Canton MSA	149	12.17	16.86	14.97	18.75	27.89	23.69	31.97	40.70	25.17	0.00	0.00	0.00	0.00	0.00	
Cleveland MSA	579	47.30	20.05	16.09	17.93	27.34	22.25	26.82	39.77	29.76	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Columbus MSA	4	0.33	11.29	50.00	13.59	0.00	21.30	0.00	53.82	50.00	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	47	3.84	17.66	23.40	19.32	14.89	23.95	25.53	39.08	36.17	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	5	0.41	13.62	20.00	16.08	40.00	24.75	40.00	45.54	0.00	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA Areas	80	6.54	15.03	21.25	18.37	18.75	24.53	35.00	42.07	25.00	0.00	0.00	0.00	0.00	0.00	

Borrower Distribution: HOME IMPROVEMENT			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****						
Full Review:																
Lawrence County	23	100.00	17.97	13.04	19.33	4.35	23.18	30.43	39.51	52.17	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (Not currently available).

** As a percentage of loans with borrower income information available. No information was available for 0.41% of Ohio and 0.0% of Pennsylvania loans originated and purchased by FirstMerit.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****						
Full Review:																
Akron MSA	3,009	24.07	19.15	10.63	18.39	21.86	23.87	24.24	38.59	43.28	5.92	5.78	6.09	5.04	6.43	
Canton MSA	2,153	17.22	17.31	8.91	17.72	20.20	25.02	27.26	39.95	43.62	7.95	6.99	6.82	6.86	9.68	
Cleveland MSA	4,240	33.91	20.09	11.20	17.34	22.72	24.07	27.44	38.51	38.64	2.90	3.46	2.77	2.83	2.88	
Limited Review:																
Columbus MSA	154	1.23	10.65	16.67	14.72	23.33	23.69	28.00	50.94	32.00	0.48	2.25	0.70	0.48	0.30	
Mansfield MSA	796	6.37	18.40	7.50	18.63	23.54	25.19	30.92	37.78	38.03	6.74	6.01	7.49	6.67	6.54	
Toledo MSA	13	0.10	14.91	46.15	17.73	30.77	25.06	15.38	42.30	7.69	0.10	0.00	0.24	0.14	0.04	
Ohio Non-MSA Areas	2,137	17.09	15.38	6.78	17.98	20.40	24.39	27.38	42.25	45.44	9.25	8.35	9.05	8.59	9.99	

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2000 TO December 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****						
Full Review:																
Lawrence County	227	100.00	19.76	3.67	20.71	16.06	24.11	29.82	35.41	50.46	7.12	3.57	4.78	6.22	8.89	

* Based on 2002 Peer Mortgage Data.

** As a percentage of loans with borrower income information available. No information was available for 1.56% of Ohio and 3.96% of Pennsylvania loans originated and purchased by FirstMerit.

*** Percentage of Families is based on the 1990 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share*				
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Akron MSA	2,145	21.73	18.96	14.63	18.42	21.05	23.14	27.04	39.48	37.28	0.00	0.00	0.00	0.00	0.00	
Canton MSA	1,600	16.21	16.86	7.12	18.75	20.79	23.69	27.40	40.70	44.69	0.00	0.00	0.00	0.00	0.00	
Cleveland MSA	3,590	36.36	20.05	9.55	17.93	21.97	22.25	26.99	39.77	41.49	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Columbus MSA	155	1.57	11.29	8.44	13.59	22.73	21.30	32.47	53.82	36.36	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	545	5.52	17.66	9.33	19.32	22.95	23.95	30.97	39.08	36.75	0.00	0.00	0.00	0.00	0.00	
Toledo MSA	15	0.15	13.62	26.67	16.08	46.67	24.75	13.33	45.54	13.33	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA Areas	1,823	18.46	15.03	7.87	18.37	20.47	24.53	28.07	42.07	43.59	0.00	0.00	0.00	0.00	0.00	

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA				Evaluation Period: January 1, 2003 TO December 31, 2003					Market Share*				
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****						
Full Review:																
Lawrence County	220	100.00	17.97	8.45	19.33	15.02	23.18	30.05	39.51	46.48	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Mortgage Data (Not currently available).

** As a percentage of loans with borrower income information available. No information was available for 2.69% of Ohio and 3.18% of Pennsylvania loans originated and purchased by FirstMerit.

*** Percentage of Families is based on the 2000 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: OHIO		Evaluation Period: January 1, 2000 TO December 31, 2002			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less	
Full Review:										
Akron MSA	2,643	28.70	77.77	46.01	60.84	21.42	17.74	6.12	10.20	
Canton MSA	1,197	13.00	78.40	49.62	56.56	20.22	23.22	5.44	10.26	
Cleveland MSA	4,503	48.90	77.17	50.88	56.05	23.65	20.30	3.31	6.14	
Limited Review:										
Columbus MSA	149	1.62	75.82	63.09	62.42	19.46	18.12	0.45	1.03	
Mansfield MSA	139	1.51	80.47	66.91	61.15	27.34	11.51	1.53	3.46	
Toledo MSA	6	0.07	78.45	16.67	100.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA Areas	571	6.20	79.70	58.14	57.62	23.47	18.91	1.77	2.72	

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: PENNSYLVANIA		Evaluation Period: January 1, 2000 TO December 31, 2002			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less	
Full Review:										
Lawrence County	177	100.00	67.20	51.98	68.36	22.03	9.60	2.27	5.20	

* Based on 2002 Peer Small Business Data.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B – 2002).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 7.14% of Ohio and 5.65% of Pennsylvania small loans to businesses originated and purchased by FirstMerit.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: OHIO		Evaluation Period: January 1, 2003 TO December 31, 2003			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less	
Full Review:										
Akron MSA	781	29.83	64.35	33.93	51.98	25.22	22.79	0.00	0.00	
Canton MSA	328	12.53	65.57	42.99	50.00	19.51	30.49	0.00	0.00	
Cleveland MSA	1,296	49.50	64.41	36.65	48.61	24.61	26.77	0.00	0.00	
Limited Review:										
Columbus MSA	12	0.46	65.50	75.00	66.67	16.67	16.67	0.00	0.00	
Mansfield MSA	41	1.57	65.69	41.46	60.98	26.83	12.20	0.00	0.00	
Toledo MSA	0	0.00	61.23	0.00	0.00	0.00	0.00	0.00	0.00	
Ohio Non-MSA Areas	160	6.11	66.45	47.50	49.38	23.75	26.88	0.00	0.00	

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: PENNSYLVANIA		Evaluation Period: January 1, 2003 TO December 31, 2003			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less	
Full Review:										
Lawrence County	20	100.00	64.00	20.00	50.00	25.00	25.00	0.00	0.00	

* Based on 2003 Peer Small Business Data: (Not currently available).

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 13.22% of Ohio and 15% of Pennsylvania small loans to businesses originated and purchased by FirstMerit.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: OHIO		Evaluation Period: January 1, 2000 TO December 31, 2002		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Akron MSA	2	3.77	91.85	0.00	0.00	100.00	0.00	4.35	0.00
Canton MSA	3	5.66	94.56	100.00	100.00	0.00	0.00	3.70	5.88
Cleveland MSA	9	16.98	92.56	88.89	77.78	22.22	0.00	0.00	0.00
Limited Review:									
Columbus MSA	2	3.77	93.85	100.00	50.00	50.00	0.00	0.00	0.00
Mansfield MSA	8	15.09	96.21	100.00	100.00	0.00	0.00	1.85	2.33
Toledo MSA	12	22.64	96.55	91.67	66.67	33.33	0.00	0.58	0.63
Ohio Non-MSA Areas	17	32.08	96.49	94.12	64.71	29.41	5.88	0.19	0.21

Borrower Distribution: SMALL LOANS TO FARMS					Geography: PENNSYLVANIA		Evaluation Period: January 1, 2000 TO December 31, 2002		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Lawrence County	0	0.00	96.35	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2002 Peer Small Business Data.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B – 2002).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of Ohio and 0.0% of Pennsylvania small loans to farms originated and purchased by FirstMerit.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: OHIO		Evaluation Period: January 1, 2003 TO December 31, 2003			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less	
Full Review:										
Akron MSA	1	7.14	90.40	0.00	100.00	0.00	0.00	0.00	0.00	
Canton MSA	0	0.00	93.15	0.00	0.00	0.00	0.00	0.00	0.00	
Cleveland MSA	2	14.29	90.29	50.00	100.00	0.00	0.00	0.00	0.00	
Limited Review:										
Columbus MSA	0	0.00	92.69	0.00	0.00	0.00	0.00	0.00	0.00	
Mansfield MSA	5	35.71	95.43	100.00	100.00	0.00	0.00	0.00	0.00	
Toledo MSA	2	14.29	96.11	100.00	50.00	50.00	0.00	0.00	0.00	
Ohio Non-MSA Areas	4	28.57	95.69	50.00	25.00	25.00	50.00	0.00	0.00	

Borrower Distribution: SMALL LOANS TO FARMS					Geography: PENNSYLVANIA		Evaluation Period: January 1, 2003 TO December 31, 2003			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less	
Full Review:										
Lawrence County	0	0.00	97.30	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2003 Peer Small Business Data (Not currently available).

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2003).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 14.29% of Ohio and 0.00% of Pennsylvania small loans to farms originated and purchased by FirstMerit.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: OHIO				Evaluation Period: July 10, 2000 TO May 17, 2004				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
Full Review:										
Akron MSA	2	2,419	53	2,611	55	5,030	26.12	0	0	
Canton MSA	1	229	29	365	30	594	3.08	0	0	
Cleveland MSA	4	2,798	46	631	50	3,429	17.81	0	0	
Limited Review:										
Columbus MSA	1	95	1	10	2	105	0.55	0	0	
Mansfield MSA	1	21	3	12	4	33	0.17	0	0	
Toledo MSA	1	2	0	0	1	2	0.01	0	0	
Ohio Non-MSA Areas	1	303	8	763	9	1,066	5.54	0	0	
Ohio Statewide Investments	7	3,580	8	2,169	15	5,749	29.85	8	4,748	
Outside AAs in Ohio	2	1,678	1	458	3	2,136	11.09	1	77	
Nationwide Investments	2	269	3	844	5	1,113	5.78	2	387	

QUALIFIED INVESTMENTS		Geography: PENNSYLVANIA				Evaluation Period: July 10, 2000 TO May 17, 2004				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
Full Review:										
Lawrence County	1	493	8	141	9	634	100.00	0	0	

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: OHIO																	
Evaluation Period: July 10, 2000 TO May 17, 2004																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Akron MSA	32.23	37	24	13.51	13.51	45.95	27.03	0	2	0	0	- 2	0	6.29	21.45	48.11	24.15
Canton MSA	16.94	16	11	6.25	12.50	62.50	18.75	0	1	0	0	0	- 1	1.95	16.77	58.75	22.53
Cleveland MSA	37.39	68	45	4.41	11.76	52.94	30.88	1	7	0	- 2	- 2	- 2	8.83	17.28	45.10	28.76
Limited Review:																	
Columbus MSA	1.82	9	6	0.00	0.00	44.44	55.56	3	0	0	0	+ 1	+ 2	0.00	5.17	52.80	42.03
Mansfield MSA	2.95	7	5	0.00	14.29	57.14	28.57	0	0	0	0	0	0	1.53	15.31	58.08	25.08
Toledo MSA	0.31	1	1	0.00	0.00	100.00	0.00	0	1	0	0	- 1	0	5.55	4.37	58.78	31.31
Ohio Non-MSA Areas	8.36	14	9	0.00	0.00	85.71	14.29	0	0	0	0	0	0	0.00	5.87	75.22	18.91

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: PENNSYLVANIA																	
Evaluation Period: July 10, 2000 TO May 17, 2004																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Lawrence County	100.00	4	100	25.00	0.00	50.00	25.00	0	0	0	0	0	0	4.26	9.29	68.72	17.73

