



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

The Huntington National Bank
Charter Number: 7745

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Office of the Comptroller of the Currency

Large Bank Supervision
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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.

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Overall CRA Rating

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

The following table indicates the performance level of **The Huntington National Bank (HNB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	The Huntington National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		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:

- Lending performance was good.
- The bank had an adequate distribution of loans among low- and moderate-income geographies and a good distribution of loans among low- and moderate-income borrowers.
- HNB's excellent community development lending had a positive impact on lending performance.
- HNB's level of investments benefiting its assessment areas was adequate.
- The bank’s service delivery systems were accessible to geographies and individuals of different income levels in the assessment areas.
- HNB provided a good level of community development services.

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 (AA).

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: 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.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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 householder 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 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 statistical 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). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division (MD): As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

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.

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 at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

The Huntington National Bank (HNB) is an interstate bank headquartered in Columbus, Ohio. As of December 31, 2006, HNB had total assets of approximately \$34.914 billion and total deposits of approximately \$25.554 billion. It is a wholly owned subsidiary of Huntington Bancshares Incorporated (HBI). HBI is also headquartered in Columbus and had total assets approximating \$35.331 billion as of December 31, 2006.

Like HNB, the Huntington Community Development Corporation (HCDC) is a subsidiary of HBI. We considered the investments made by HCDC when evaluating the bank's performance under the Investment Test. Refer to the "Scope of the Evaluation" section for more information.

HNB offers a range of consumer and commercial banking products and services within its assessment areas, including mortgage banking, automobile financing, equipment leasing, investment management, brokerage, trust, and insurance services. HNB offers agricultural loans based upon local needs, but they are not a focus for the bank. For purposes of CRA evaluation, HNB is an interstate bank operating 405 offices in Ohio, Michigan, Indiana, West Virginia, Florida, and both the Ohio and Kentucky portions of the Cincinnati-Middletown, OH-KY-IN Multistate Metropolitan Area (Cincinnati MMA). Refer to the "Multistate Metropolitan Area Rating" section and "State Ratings" section of this performance evaluation for additional details on the locations of HNB's offices.

HNB operates three major business lines: Regional Banking, Dealer Sales, and the Private Financial Capital Markets Group (PFCMG or also known as PFG).

- Regional Banking provides products and services to consumers and businesses. HNB's products include home equity loans, first mortgage loans, direct installment loans, business loans, international trade services, cash management services, personal deposit products, business deposit products, investment services, and insurance services. These products and services are offered through HNB's traditional branch network, its telephone banking center, and the internet.
- Dealer Sales serves automotive dealerships within HNB's primary banking markets, as well as in Arizona, Florida, Georgia, New Jersey, North Carolina, Pennsylvania, South Carolina, and Tennessee. The services provided by this business line include financing the purchase of automobiles by customers of the automotive dealerships; purchasing automobiles from dealers and simultaneously leasing the automobiles under long-term operating and direct financing leases; financing dealerships' inventories of automobiles; and providing other banking services to the automotive dealerships and their owners.
- PFCMG provides products and services to higher net worth and higher income individuals as well as to corporate and to institutional customers. PFCMG offers trust, asset management, investment advisory, brokerage, insurance, deposit products, and loan products. PFCMG also serves corporate and institutional customers by offering products and services that include investment banking, sales and trading of securities, and mezzanine capital financing.

As of December 31, 2006, HNB had Tier One Capital of \$1.989 billion. HNB's loan-to-deposit ratio on that date was 101.5 percent and net loans represented 74.33 percent of total assets. By dollar amount, the loan portfolio consisted of the following types of credit: 47.1 percent commercial (including commercial real estate); 17.4 percent residential real estate; 26.9 percent consumer; 6.8 percent lease financing receivables; and 1.7 percent other loans.

On February 15, 2002, HNB sold its Florida banking operations to SunTrust Banks, Inc., as part of a strategic refocusing plan. The sale included 143 banking offices and 456 automated teller machines (ATMs), with approximately \$2.8 billion in loans and other tangible assets. The sales agreement included a non-competition clause. Within Florida, the clause limited HNB to offering deposit and trust products and services to clients of its Private Financial Group, to originating residential mortgage loans, and to originating indirect auto loans. The clause remained in effect until February 2005. There are no other known legal, financial, or other impediments that would hamper HNB's ability to help meet the credit needs of its assessment areas.

On March 1, 2006, HNB completed its merger with Canton, Ohio-based Unizan Financial Corp. (Unizan). Unizan operated 42 banking offices in five metropolitan markets in Ohio: Canton, Columbus, Dayton, Newark, and Zanesville. Refer to the "Scope of the Evaluation" section for more information about Unizan data considered during this CRA examination of HNB.

HNB received a "Satisfactory" rating at the last CRA examination dated March 31, 2003.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending, Investment, and Service Tests in this examination covered the period from January 1, 2003 to December 31, 2006. In our assessment of the bank's performance under the Lending Test, we evaluated the bank's residential real estate lending reported for the Home Mortgage Disclosure Act (HMDA), and we evaluated the small loans to businesses and farms reported for the Community Reinvestment Act (CRA). In addition, we evaluated the bank's community development loans. HNB offers agricultural loans primarily as an accommodation to its customers, resulting in a low volume of agricultural loans. Consequently, an analysis and discussion of agricultural loans is not meaningful in evaluating the bank's performance. The bank's volume of multifamily loans was also very low, and the analysis of these loans was not meaningful.

In our assessment of its performance under the Investment Test, we evaluated HNB's community development investments and donations. We also evaluated the community development investments made by HCDC.

In our evaluation of HNB's performance under the Service Test, we evaluated the retail services offered by HNB, the location of its branches and other offices, its record of opening and closing offices and community development services provided by bank employees and officers.

Data Integrity

As part of this CRA examination, HNB's publicly-filed information on home mortgage loans and small loans to businesses was tested for accuracy. Our testing included an evaluation of HNB's processes to ensure that its data was reliable. Community development (CD) loans and CD services were also tested to ensure they met the regulatory definitions for community development activities. Recordkeeping issues were found when reviewing the grants and donations submitted as CD investments. Therefore, we reviewed all grants and donations submitted by HNB and included those that we verified were qualified for consideration as CD investments.

In the 2000 Decennial Census, many census tracts experienced changes in physical boundaries and in demographic characteristics. New census tracts were formed as old census tracts changed boundaries, merged, split, or disappeared. Lenders were required to use these changed census tract boundaries to report property location for loans and applications for the first time in 2005 when lenders were reporting their 2004 data. As a result of these changes and to aid in the comparison of its data, HNB re-geocoded its 2003 HMDA and CRA loans to meet the 2004 data standards. The bank's re-geocoding was validated during our examination and found to be reliable.

Selection of Areas for Full-Scope Review

For purposes of this evaluation, five individual state ratings and one Multistate Metropolitan Area (MMA) were blended into HNB's overall rating. HNB's AA within the MMA was selected

for full-scope review, and one AA was also selected for a full-scope review in each state. These full-scope areas were primarily selected based on which areas had the highest percentages of deposits. In the State of West Virginia, HNB's combined non-metropolitan AAs had the highest percentage of deposits for the state. The Charleston AA had the second highest percentage of deposits for the state, having 6.58 percent less in deposits than the combined non-metropolitan AA. However, given the relative similarity between the deposit percentages, the Charleston AA was selected because it had the greater need for loans, investments and services when the level of need is measured by the larger number of low- and moderate-income tracts within the Charleston AA when compared to the combined non-metropolitan AA.

Ratings

HNB's overall rating is a blend of the Cincinnati MMA rating and state ratings.

The ratings for the States of Michigan, Ohio, and West Virginia and for the Cincinnati MMA were weighted most heavily in determining the overall rating for HNB. Based upon numbers of branches and upon loan and deposit volume, the bank had its largest operational presence in these states and the MMA. This weighting was also consistent with the strategic plans of bank management to emphasize operations and to seek growth opportunities within the midwestern region of the country. The State of Ohio received the greatest weight in determining the overall rating for HNB since Ohio represented 62.62 percent of HNB's deposits, followed by Michigan (21.20 percent), West Virginia (6.29 percent), and the Cincinnati MMA (6.32 percent).

HNB's rating for the State of Indiana was given less weight because the bank had a significantly smaller presence in the state. The bank had branches in the greater Indianapolis area, the Lafayette area, and the Muncie area. Its deposits represented less than 1 percent of the deposits in all of the chartered financial institutions in Indiana and less than 3.3 percent of HNB's total deposits in Indiana. The bank did not have a physical presence in the majority of the state.

HNB's rating for the State of Florida was given the least weight because the bank only had offices in two areas of the state during the evaluation period. The bank's CRA performance was evaluated in the state because these offices were licensed as full service branches, although only limited services were offered and those services were offered primarily to private banking (high income/net worth) clients. As discussed in the Description of the Institution section of this performance evaluation, HNB sold its retail operations in 2002 and agreed to a non-competition clause in the sales agreement which remained in effect until February 2005. We are evaluating the bank's performance within the context of the restrictions established by the non-competition clause and the bank's operational strategy.

Our conclusions under the Lending Test were based primarily on the bank's performance in home mortgage and small business lending. Home mortgage loans represented 61 percent of the bank's reported lending and small loans to businesses represented 38 percent. CD loans also received positive consideration in AAs in which such lending had an impact.

The multistate metropolitan area rating and state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each state and

Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Fair Lending Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Multistate Metropolitan Area Rating

Cincinnati MMA

CRA rating for the Cincinnati MMA¹: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The volume of lending demonstrated good responsiveness to community needs.
- Lending distribution was good among geographies of different income levels.
- The excellent level of CD lending had a positive impact on the bank's overall Lending Test rating.
- HNB had a good distribution of delivery systems that were accessible to individuals and geographies of different income levels.
- The bank provided a good level of CD services that had a positive impact on low- and moderate-income individuals.
- HNB had an adequate level of qualified investments.

Description of Institution's Operations in Cincinnati MMA

HNB had an AA within the Cincinnati MMA. HNB's Cincinnati AA consisted of three entire counties in Kentucky (Boone, Kenton, and Campbell), three entire counties in Ohio (Hamilton, Butler, and Warren), and fourteen census tracts in Clermont County, Ohio. The fourteen census tracts from Clermont County were included in the AA to reflect the inclusion of whole cities within Clermont County and the areas of the county that the bank could reasonably be expected to serve. The assessment area complies with the CRA requirements and does not arbitrarily exclude low-and moderate-income geographies.

HNB had 35 branches within the AA, representing 8.64 percent of the bank's total branch network. Six new branches were opened in the AA during the evaluation period, and one was closed. As of June 30, 2006, the bank ranked fifth within the AA in total deposits with a 3.97 percent market share. HNB's deposits totaled \$1.5 billion. Deposit competitors include Fifth Third, U.S. Bank, National City, and PNC.

Based on deposits, the Cincinnati MMA was the fourth largest rating area and accounted for approximately 6.32 percent of total bank deposits. During the evaluation period, HNB

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

originated 9.08 percent of its total reportable HMDA loans and small loans to businesses in the AA.

Refer to the Market Profile for the Cincinnati MMA in Appendix C for detailed demographics and other performance context information.

LENDING TEST

Lending Test performance in the Cincinnati MMA is rated Outstanding.

Lending Activity

Refer to Table 1 Lending Volume for the Cincinnati MMA in Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Cincinnati MMA was good. In 2006, HNB was ranked fifth out of 87 institutions (94th percentile) with a 3.72 percent market share in deposits. In 2005, the bank had a HMDA market share of 1.28 percent and was ranked 20th out of 627 lenders (97th percentile). The bank had a small business market share ranking of 12th (89th percentile) with a 2.75 percent market share. Prior years reflected similar market share percentages and rankings. The Cincinnati MMA is a highly competitive area for financial services, and HNB's market penetration and volume was considered good.

Analysis for the Lending Test in the Cincinnati AA rested primarily on home mortgage and small business lending. In evaluating the geographic distribution of the bank's home mortgage and small business loans, we gave more weight to the geographic distribution and market share in moderate-income geographies because the Cincinnati MMA had significantly more moderate-income tracts than it had low-income tracts. Therefore, it had more opportunities for lending in moderate-income geographies. In evaluating the bank's lending to borrowers of different income levels, we considered the difficulty that low-income borrowers have in obtaining home mortgage loans. The AA had a significant percentage of households living below the poverty level. Our evaluation of HNB's performance in lending to low-income borrowers improved when considering these mitigating factors. Community development lending had a positive impact on the bank's overall Lending Test rating.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

During the evaluation period, HNB had a good distribution of home purchase loans.

In low-income geographies, the geographic distribution of home purchase loans was excellent as loans made in low-income geographies exceeded the percentage of owner-occupied units in those low-income geographies. The bank's market share of home purchase loans in low-

income geographies exceeded the bank's overall home purchase market share in the AA and was excellent.

Within moderate-income geographies, the geographic distribution of home purchase loans was adequate. The distribution of home purchase loans in moderate-income geographies was somewhat lower than the percentage of owner-occupied units. The bank's home purchase market share in moderate-income geographies substantially met the overall market share of home purchase loans in the AA and was good.

During the evaluation period, the geographic distribution of home improvement loans was adequate.

The geographic distribution of home improvement loans in low-income geographies was somewhat lower than the percentage of owner-occupied units in those geographies and was adequate. HNB's market share of home improvement loans in low-income geographies was lower than the bank's overall home improvement lending market share in the AA and was poor.

The geographic distribution of home improvement loans in moderate-income geographies was near to the percentage of owner-occupied units in those geographies and was good. The bank's market share of home improvement loans in moderate-income geographies was somewhat lower than the bank's overall home improvement lending market share in the AA and was adequate.

Home refinance loan geographic distribution was adequate for the evaluation period in the Cincinnati MMA.

Geographic distribution of home refinance loans in low-income geographies was poor with the percentage of loans originated in low-income geographies lower than the percentage of owner-occupied units. HNB's market share of home refinance loans in low-income geographies was also lower than the bank's overall home refinance market share in the AA and was poor.

The geographic distribution of home refinance loans in moderate-income geographies was somewhat lower than the percentage of owner-occupied units and was adequate. The bank's market share of home refinance loans in moderate-income geographies substantially met the bank's overall home refinance market share in the AA and was good.

Small Loans to Businesses

Refer to Table 6 for the Cincinnati MMA 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 in Cincinnati AA was good. The geographic distribution of small loans to businesses in low-income geographies was adequate. The percentage of loans originated in low-income geographies was somewhat lower than the percentage of small businesses in low-income geographies. The bank's market share of small loans to businesses in low-income geographies substantially met the bank's overall market share of small loans to businesses and considered good.

The distribution of small loans to businesses in moderate-income geographies was near to the percentage of small businesses located in moderate-income geographies and represented a good level of lending. HNB's market share of small loans to businesses in moderate-income geographies exceeded the bank's overall small loans to businesses market share in the AA and was excellent.

Lending Gap Analysis

There were no significant unexplained conspicuous lending gaps identified within the Cincinnati AA. Reports detailing HNB's lending activity over the evaluation period were reviewed to identify gaps in the geographic distribution of those loans. Eight (14.81 percent) low-income tracts did not have any HMDA or small business loan activity during the evaluation period. The demographic data of these eight tracts showed that only 5 percent of the housing units were owner-occupied and represented 0.07 percent of the total owner-occupied housing units in the AA. The 516 small businesses located within these eight tracts represent 0.86 percent of the small businesses in the AA. Only two (2.13 percent) moderate-income tracts did not have any HMDA or small business loan activity during the evaluation period.

Inside/Outside Ratio

This ratio is a bank wide calculation and is not calculated by individual rating area or AA. During the evaluation period, 67.28 percent of the HMDA loans were originated inside the bank's designated AAs, and 86.53 percent of the small business loans were originated inside the bank's AAs. This distribution of loans was considered good and positively impacted the overall geographic distribution evaluation.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

During the evaluation period, the borrower distribution of home purchase loans was good.

The borrower distribution of home purchase loans to low-income borrowers was somewhat lower than the percentage of low-income families and considered adequate. The bank's market share of home purchase loans to low-income borrowers substantially met the bank's overall home purchase market share and was good.

Overall, the borrower distribution of home purchase loans to moderate-income borrowers was near to the percentage of moderate-income families and considered excellent. The bank's market share of home purchase loans to moderate-income borrowers substantially met the bank's overall home purchase market share and considered good.

The borrower distribution of home improvement loans during the evaluation period was excellent.

The borrower distribution of home improvement loans to low- and moderate-income borrowers exceeded the percentage of low- and moderate-income families and considered excellent. The bank's market share of home improvement loans to low- and moderate-income borrowers exceeded the bank's overall home improvement market share and considered excellent.

During the evaluation period, the borrower distribution of home refinance loans was adequate.

The borrower distribution of home refinance loans to low-income borrowers was below the percentage of low-income families and considered poor. The bank's market share of home refinance loans to low-income borrowers substantially met the bank's overall home refinance market share and considered good.

The borrower distribution of home refinance loans to moderate-income borrowers was excellent. The distribution of home refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families. HNB's market share of home refinance loans to moderate-income borrowers substantially met the bank's overall home refinance market share and considered good.

Small Loans to Businesses

Refer to Table 11 for the Cincinnati MMA borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses was good. The percentage of loans to small businesses was near to the percentage of small businesses. The bank's market share of small loans to businesses greatly exceeded its overall business loan market share. The bank made a majority of its small loans to businesses in amounts below \$100 thousand.

Community Development Lending

Refer to Table 1 Lending Volume for the Cincinnati MMA in Appendix D for the facts and data used to evaluate the bank's level of community development lending.

During the evaluation period, the bank's level of community development lending for the area was excellent and had a positive impact on the overall evaluation of its lending performance in the Cincinnati MMA. HNB made 20 qualified community development loans in the AA for a total of \$17.6 million.

Product Innovation and Flexibility

In addition to the standard mix of loan products, HNB offered loan products with flexible terms. These products were not considered innovative and had a neutral impact on the overall evaluation of the bank's lending performance in the AA. In the Cincinnati MMA during the evaluation period, the bank made 62 Federal Housing Administration (FHA) loans and nine Veterans Affairs (VA) loans in the Cincinnati MMA. The bank also made 264 FNMA flexible term loans and two loans under special state loan programs. HNB originated 189 loans in the AA that were retained within its portfolio due to terms not immediately saleable in the

secondary market. In total, during the evaluation period, HNB originated 1,401 loans with flexible underwriting standards or terms for a total of over \$170 million extended throughout the Cincinnati MMA.

INVESTMENT TEST

HNB's performance under the Investment Test in the Cincinnati MMA is rated Low Satisfactory. Refer to Table 14 in the Cincinnati MMA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments. Refer to the AA Market Profile in Appendix C for details of identified opportunities and needs in the AA.

During the evaluation period, HNB provided qualified investments within its AA through purchases of securities, cash contributions, and grants. HNB originated four investments in the AA totaling over \$2.5 million. We considered these investments, along with the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on twelve prior period investments as of year-end 2006 was \$1.2 million. We also considered donations and grants made by HNB during the evaluation period to organizations with a community development focus. HNB made 53 contributions to 26 different community development organizations, totaling \$87 thousand during the evaluation period.

HNB's qualified investments were responsive to the identified needs of the AA. The investments addressed the identified needs for affordable housing and community services. They were routine and non-complex in nature. To provide perspective regarding the relative level of qualified investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits. The volume of total funded investments represented approximately 3.0 percent of the allocated Tier One Capital.

HNB had over \$2.2 million in unfunded commitments to organizations within the AA. We considered HNB's unfunded commitments as performance context information for the AA.

SERVICE TEST

HNB's performance under the Service Test in the Cincinnati MMA is rated High Satisfactory.

Retail Banking Services

HNB's systems for delivering retail banking services in the Cincinnati AA were accessible to geographies and individuals of different income levels. Refer to Table 15 in the Multistate Metropolitan Area section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB had a good distribution of delivery systems that were accessible to individuals and geographies of different income levels in the AA. HNB had 35 full-service branches and two retirement offices in the Cincinnati AA. The bank did not have any branches in low-income geographies, which contain just over 7.00 percent of the population within the AA. Five branches, representing 14.29 percent of the bank's branches, were located in moderate-

income geographies. The percentage of the bank's branches in moderate-income geographies was near to the percentage of the population residing in those geographies.

HNB's opening and closing of branches in the Cincinnati AA generally did not adversely affect the accessibility of delivery systems to low- and moderate-income individuals and geographies. HNB opened six branches and closed one branch during the evaluation period. However, none of these were in low- or moderate-income geographies.

The bank's hours and services offered throughout the assessment area were good. There were only minor differences in the bank's services and business hours throughout the AA, none of which adversely affected low- or moderate-income geographies or individuals. In addition to offering Monday through Friday banking hours, many branches offered Saturday banking hours. Branch personnel were also available for appointments outside the standard service hours. Management periodically reviewed branch business hours to ensure they met the needs of the local community.

Alternative Delivery Systems

The bank's ATM network offered a reasonably effective alternative system for delivering retail banking services to low- and moderate-income individuals and geographies. In addition to ATMs at the majority of its offices, HNB offered ATMs in convenience and grocery stores in the AA. HNB operated 117 ATMs in the Cincinnati AA. The percentage of ATMs located in low-income geographies (2.56 percent) is below, and in moderate-income geographies (25.00 percent) exceeds, the percentage of the population in those geographies.

HNB offered other alternative delivery systems, including banking by telephone and internet banking. Telephone banking services were available 24 hours a day via a toll-free telephone number. This service allowed customers to open accounts, apply for loans, and access deposit and loan information. Telephone banking services were offered in English and Spanish. Internet banking services were also available 24 hours a day. This service allowed customers to access account balances, download account transaction information, transfer funds, apply for loans and new accounts, and pay bills. No information was available on the effectiveness of these services in reaching low- and moderate-income individuals or geographies. We did not place significant weight on these systems when drawing conclusions under the Service Test.

Community Development Services

HNB's performance in providing community development (CD) services in the Cincinnati AA is rated good. Bank management and employees provided a relatively high level of CD services targeted to low- and moderate-income individuals and geographies within HNB's AA. Over 800 hours of CD services were provided to 35 organizations during the evaluation period. These services included providing credit counseling, first-time homebuyer seminars, technical financial and management expertise to nonprofit or government organizations, and financial education and management skills.

The following are examples of CD services performed in this AA during the evaluation period:

- An employee served as a member of the loan committee of the Hamilton County Development Corporation. This non-profit economic development corporation provided financing and entrepreneurial assistance for companies that locate or expand in designated enterprise zones or community reinvestment areas in this AA.
- An employee was a board member and a member of the loan committee for People Working Cooperatively. This organization provided free home weatherization and maintenance services for low-income elderly and disabled homeowners in the bank's AA.
- Employees participated in financial literacy programs offered by schools and community development organizations. These programs provided low- and moderate-income participants with information on the availability and proper use of banking products and services.
- One employee volunteered at the Brighton Center. This organization provided free homebuyer training classes to low- and moderate-income individuals. These classes explained the mortgage loan process, how to find a real estate agent, home owners insurance, home appraisal, home inspection, and more.
- Bank employees established and supervised a "mock" banking office at Burton Elementary School in the bank's AA. The bank was run by the students, the majority of which were from low-and moderate-income families. The program focused on financial literacy and helped teach students the value of a savings account. The students were responsible for creating flyers and posters to promote the bank, for opening new accounts, for making deposits, for counting money, and for balancing accounts.

State Rating

State of Florida

CRA Rating for Florida²:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- The volume of lending demonstrated adequate responsiveness to community needs.
- Lending distribution was adequate among geographies and borrowers of different income levels.
- CD lending was excellent and had a positive impact on the bank’s lending performance.
- HNB's performance in providing CD services was adequate.
- HNB had an excellent level of qualified investments.

Description of Institution’s Operations in Florida

HNB had two AAs within the State of Florida. They included the Naples AA and the Fort Pierce AA. At the beginning of the evaluation period, HNB had three branches within the state. Two branches were in the Naples AA, and one was in the Fort Pierce AA. The branch in the Fort Pierce AA was sold in 2006. HNB's branches within the State of Florida represent less than one percent of the bank's total branch network. As discussed previously, HNB management made a strategic decision to sell nearly all of its Florida banking operations in 2002.

As of June 30, 2006, the bank ranked 320th in total state deposits with a 0.01 percent market share. HNB’s statewide deposits totaled \$44.526 million. Based on deposits, Florida was the smallest state rating area and accounted for less than one percent of total bank deposits. During the evaluation period, HNB originated 0.40 percent of its total reportable HMDA loans and small loans to businesses in Florida.

Refer to the Market Profile for the State of Florida in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution’s performance in that area.

Scope of Evaluation in Florida

Our evaluation in Florida consisted of a full-scope evaluation of CRA performance in the Naples AA and a limited-scope evaluation in the Fort Pierce AA. As of December 31, 2006, the Naples AA was HNB's only AA in Florida with 100 percent of the bank's deposits.

As discussed in the "Description of the Institution," HNB sold its Florida retail banking operations in 2002 to SunTrust Bank. The sales contract restricted the products and services that the bank could offer in Florida. Since the sale, HNB has operated limited offices in Florida, which are licensed as full-service branches. Although licensed as full-service branches, the offices are operated as Private Financial Group (PFG) offices and offer a limited menu of products and services. At the beginning of the evaluation period, HNB had three offices licensed as full-service branches, two in the Naples AA and one in the Fort Pierce AA. In 2006, HNB sold its one remaining office licensed as a full-service branch in the Fort Pierce AA.

The ratings for Florida were based primarily on the results of the Naples AA, which was the area receiving a full-scope review. We considered HNB's performance within the context of its operational strategy in Florida and the terms of its sale of the retail banking operation to SunTrust Bank. Although HNB sold its one remaining branch in the Fort Pierce AA during the evaluation period, we also conducted a limited-scope review of the Fort Pierce AA because HNB operated that branch for all but a portion of 2006. Refer to the Market Profiles in Appendix C for detailed demographics and other performance context information for the full-scope AA.

In conducting our evaluation, we considered input received from community contacts. The two organizations contacted were involved primarily with affordable housing initiatives. They stated that the primary needs in the Naples AA were affordable housing programs, construction financing, financial literacy programs, and community services targeted to low- or moderate-income persons. We considered those needs in our evaluation of HNB's performance in the State of Florida.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of Florida is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Naples AA was good.

Lending Activity

Refer to Table 1 Lending Volume for the State of Florida in Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Naples AA was adequate. In 2006, HNB was ranked 20th out of 36 institutions (44th percentile) with a 0.75 percent market share in deposits. In 2005, the bank

had a HMDA market share of 0.20 percent and was ranked 80th out of 816 lenders (90th percentile). The bank had a small business market share ranking of 22nd out of 104 lenders (79th percentile) with 0.18 percent market share. Prior years reflected similar market share percentages and rankings. The Naples AA is a highly competitive area for financial services, and based upon the specialized nature of HNB's offices in Florida, the bank's market penetration and volume were considered adequate.

Analysis for the Lending Test in the Naples AA rested primarily on home purchase, home refinancing, and small loans to businesses. Home improvement lending was not meaningful to the analysis of the bank's performance; HNB made only one home improvement loan during the evaluation period. In evaluating the bank's lending to borrowers of different income levels, we considered the difficulty that low-income borrowers have in obtaining home mortgage loans. The AA had a significant percentage of households living below the poverty level. Our evaluation of HNB's performance in lending to low-income borrowers improved when considering these mitigating factors. Community development lending positively impacted the bank's overall lending performance in the AA.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

During the evaluation period, the geographic distribution of home purchase loans was adequate.

The geographic distribution of home purchase loans in low-income geographies was excellent as loans made in low-income geographies significantly exceeded the percentage of owner-occupied units in those geographies. The bank's market share of home purchase loans in low-income geographies also significantly exceeded the bank's overall home purchase market share in the AA.

The geographic distribution of home purchase loans in moderate-income geographies was poor. The distribution of home purchase loans in moderate-income geographies was lower than the percentage of owner-occupied units. The bank's market share of home purchase loans in moderate-income geographies was also lower than the bank's overall home purchase market share and considered poor.

HNB made only one home improvement loan in the AA during the evaluation period. Therefore, analysis of home improvement lending within the AA was not meaningful.

Home refinance loan geographic distribution was poor for the evaluation period in the Naples AA.

The geographic distribution of home refinance loans in both low- and moderate-income geographies was poor. HNB's percentages of loans originated in low- and moderate-income

geographies were lower than the percentages of owner-occupied units in those geographies. The bank's market shares of home refinance loans in low- and moderate-income geographies were also lower than the bank's overall home refinance market share in the AA and was poor.

Small Loans to Businesses

Refer to Table 6 for the State of Florida 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 in the Naples AA was adequate. The geographic distribution of small loans to businesses in low-income geographies was excellent; the percentage of loans originated in low-income geographies significantly exceeded the percentage of small businesses in low-income geographies. The bank's market share of small loans to businesses in low-income geographies also significantly exceeded the bank's overall market share of small loans to businesses and was excellent.

The geographic distribution of small loans to businesses in moderate-income geographies was poor. The distribution of small loans to businesses in moderate-income geographies was lower than the percentage of small businesses located in moderate-income geographies. The bank's market share of small loans to businesses in moderate-income geographies substantially met the bank's overall market share for small loans to businesses market share and was good.

Lending Gap Analysis

There were no significant unexplained conspicuous lending gaps identified within the Naples AA. Reports detailing HNB's lending activity over the evaluation period were reviewed to identify gaps in the geographic distribution of those loans. Only one low-income tract and one moderate-income tract did not have any HMDA or small business loan activity during the evaluation period. The low-income tract contained 0.22 percent of the owner-occupied housing units in the assessment area and 0.17 percent of the small businesses located in the AA. The moderate-income tract contained 1.24 percent of the owner-occupied housing units and 1.43 percent of the small businesses located in the AA.

Inside/Outside Ratio

This ratio is a bank wide calculation and is not calculated by individual rating area or AA. During the evaluation period 67.28 percent of the HMDA loans were originated inside the bank's designated AAs, and 86.53 percent of the small business loans were originated inside the bank's AAs. This distribution of loans was considered good and positively impacted the overall geographic distribution evaluation.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

During the evaluation period, borrower distribution of home purchase loans was adequate in the Naples AA.

Borrower distribution of home purchase loans to low-income borrowers was somewhat lower than the percentage of low-income families and was adequate. The bank's market share of home purchase loans to low-income borrowers significantly exceeded the bank's overall home purchase market share and was excellent.

Borrower distribution of home purchase loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income families and considered adequate. The bank's market share of home purchase loans to moderate-income borrowers significantly exceeded the bank's overall home purchase market share and was excellent.

The bank made only one home improvement loan in the AA during the evaluation period. Therefore, analysis of home improvement lending within the AA was not meaningful.

Home refinance loan borrower distribution was adequate for the evaluation period in the Naples AA.

Borrower distribution of home refinance loans to low-income borrowers was lower than the percentage of low-income families and considered poor. However, HNB's market share of home refinance loans to low-income borrowers exceeded the bank's overall home refinance market share and was excellent.

Overall, borrower distribution of home refinance loans to moderate-income borrowers was adequate. The distribution of home refinance loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income families. The bank's market share of home refinance loans to moderate-income borrowers greatly exceeded the bank's overall home refinance market share in the AA and was excellent.

Small Loans to Businesses

Refer to Table 11 for the State of Florida in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Borrower distribution of small loans to businesses in the Naples AA was excellent. The percentage of loans to small businesses exceeded the percentage of small businesses. The bank's market share of small loans to businesses significantly exceeded its overall business

loan market share. The bank made a majority of its small loans to businesses in amounts below \$100 thousand.

Community Development Lending

Refer to Table 1 Lending Volume for State of Florida in Appendix D for the facts and data used to evaluate the bank's level of community development lending.

The bank's level of community development lending for the area during the evaluation period was excellent and had a positive impact on the overall evaluation of its lending performance in the Naples AA. The two qualified community development loans supported community development services and economic development targeted towards small businesses.

Product Innovation and Flexibility

In addition to the standard mix of loan products, HNB offered loan products on flexible terms. These products were not considerate innovative and had a neutral impact on the overall evaluation of the bank's lending performance in the AA. During the evaluation period, the bank made 44 loans in the AA that were retained within its portfolio due to terms not immediately saleable in the secondary market, and the bank also made one FNMA flexible term loan. In total, HNB originated 70 loans with flexible underwriting standards or terms for over \$11 million throughout the Naples AA during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

In the Fort Pierce AA, the bank's performance was weaker than the bank's overall performance in the State of Florida. Refer to the Tables 1 through 13 for the State of Florida in Appendix D for the facts and data that support these conclusions. Weaker performance was noted in regards to both geographic and borrower distribution for home purchase loans and borrower distribution for home refinancing loans. The geographic distribution of small business lending was stronger than the bank's overall performance in the State of Florida. Geographic distribution of home refinance lending and borrower distribution of small business lending were not inconsistent. The bank sold its branch in the Fort Pierce AA during the evaluation period. HNB's lending performance in the Fort Pierce AA did not impact our conclusions for the State of Florida.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Florida is rated Outstanding. Based on the full-scope review, the bank's performance in the Naples AA was excellent. Refer to Table 14 in the State of Florida section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments. Refer to the AA Market Profile in Appendix C for details of identified opportunities and needs in the AA.

HNB provided qualified investments within its AA through purchases of securities, cash contributions, and grants. HNB originated one investment in the AA totaling \$293 thousand

during the evaluation period. HNB also made donations and grants to organizations with a community development focus. HNB made six contributions to four different community development organizations, totaling \$18 thousand during the evaluation period. As of year-end 2006, there were no remaining balances on any investments made within the AA prior to the current evaluation period.

HNB's qualified investments were responsive to the identified needs of the Naples AA. The investments addressed the identified needs for affordable housing and community services and were routine and non-complex in nature. To provide perspective regarding the relative level of qualified investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits. The volume of total funded investments represented approximately 8.2 percent of the allocated Tier One Capital.

HNB had nearly \$7 thousand in unfunded commitments to organizations within the AA. We considered HNB's unfunded commitments as performance context information for the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Fort Pierce AA was weaker than the bank's overall performance under the Investment Test in the State of Florida. HNB sold its only branch in this AA during the evaluation period. Performance in this AA did not have a significant impact on the overall conclusion for Florida. Refer to Table 14 in the State of Florida section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

HNB's performance under the Service Test in Florida is rated Low Satisfactory. The bank's performance in the Naples AA was adequate. As mentioned previously, HNB sold its Florida banking operations to SunTrust Banks, Inc., as part of a strategic refocusing plan in 2002 to concentrate its retail operations in the midwestern region of the country. The sales agreement included a non-competition clause. Within Florida, the clause limited HNB to offering deposit and trust products and services to its PFG clients, to originating residential mortgage loans, and to originating indirect auto loans. The clause remained in effect for the majority of this evaluation period. HNB's strategic objective of concentrating retail operations in the Midwest have not changed since 2002. HNB's retail strategic focus remains on the Midwest. As required by the non-compete clause, the HNB maintained offices in Florida only to serve its PFG customers. Since the offices only exist to serve those limited customers, the branches were not staffed to serve the general public. However, HNB did offer services through alternative delivery systems.

Retail Banking Services

HNB had two offices in the AA. These offices were PFG offices that did not offer retail products and services to the general public. These offices only offered products and services for PFG clients. HNB did not open or close any branches in this AA during the evaluation period.

The bank had adequate accessibility of its service delivery systems in the Naples AA. Refer to Table 15 in the State of Florida section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Alternative Delivery Systems

HNB did not have ATMs in the AA, but offered retail banking services through alternative delivery systems, including banking by telephone and internet banking. Telephone banking services were available 24 hours a day via a toll-free telephone number. This service allowed customers to open accounts, apply for loans, and access deposit and loan information. Telephone banking services were offered in English and Spanish. Internet banking services were also available 24 hours a day. This service allowed customers to access account balances, download account transaction information, transfer funds, apply for loans and new accounts, and pay bills. No information was available on the effectiveness of these services in reaching low- and moderate-income individuals or geographies. We did not place significant weight on these systems when drawing conclusions under the Service Test.

Community Development Services

HNB's performance in providing CD services in the Naples AA was adequate. Due to limited staffing in its two offices, HNB had limited resources and opportunities to provide CD services. During the evaluation period, HNB provided CD services aimed at promoting affordable housing in the AA. HNB staff worked with local residents to inform them of credit products and help them apply and qualify for home purchase loans in the Jubilation development, an affordable housing development sponsored by the non-profit group, Harvest for Humanity.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on our limited-scope review, the bank's performance under the Service Test in the Fort Pierce AA was not inconsistent with the bank's overall "Low Satisfactory" performance under the Service Test in Florida. Refer to Table 15 in Appendix D for the facts and data that support this conclusion.

State of Indiana

CRA Rating for Indiana³: Outstanding
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The volume of lending demonstrated adequate responsiveness to community needs.
- Lending distribution was good among geographies of different income levels.
- Overall, the distribution of lending to borrowers of different income levels was excellent.
- HNB's delivery systems were reasonably accessible to individuals and geographies of different income levels.
- The excellent level of CD lending had a positive impact on the Lending Test rating.
- HNB had a good level of qualified investments that were responsive to the community development needs of the AAs.

Description of Institution's Operations in Indiana

HNB had three AAs within the State of Indiana. They included the Lafayette AA, the Anderson AA, and the Indianapolis AA. HNB had 25 branches within the state, representing 6.17 percent of the bank's total branch network. One new branch was opened in the state during the evaluation period, and none was closed.

As of June 30, 2006, the bank ranked 11th within the state in total deposits with less than a one percent market share. HNB's deposits totaled \$798 million. Deposit competitors include JPMorgan Chase, National City, and Fifth Third.

Based on deposits, Indiana was HNB's fifth largest rating area out of its six rating areas and accounted for approximately 3.29 percent of total bank deposits. During the evaluation period, HNB originated 6.16 percent of its total reportable HMDA loans and small loans to businesses in Indiana.

Refer to the Market Profile for the State of Indiana in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Scope of Evaluation in Indiana

We conducted a full-scope review of the Indianapolis AA. This AA had 77.26 percent of the bank's deposits within the state and accounted for approximately 63.66 percent of HMDA lending and 89.02 percent of small loans to businesses originated by the bank in the state during the evaluation period. As of December 31, 2006, the Indianapolis AA had 76 percent of the bank's branches within the state. We based ratings for the State of Indiana primarily on the results of our analysis of the AA selected for full-scope review because the majority of Indiana deposits and loans were located in this AA. Refer to the Market Profiles in Appendix C for detailed demographics and other performance context information for the full-scope AA.

We conducted limited-scope reviews of the Anderson AA and the Lafayette AA.

We considered input received from community contacts. The four organizations contacted were involved primarily with affordable housing and economic development. They stated that significant needs within the Indianapolis AA included affordable housing, affordable construction financing, financial literacy/foreclosure prevention programs, small business loans, and donations or affordable construction financing for community groups to aid them in their missions. They also stated that there were needs for down payment assistance, home ownership training, and housing for senior citizens. We considered all of these needs in our evaluation of HNB's performance in the State of Indiana.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of Indiana is rated Outstanding. Based on a full-scope review, the bank's Lending Test performance in the Indianapolis AA is excellent.

Lending Activity

Refer to Table 1 Lending Volume for the State of Indiana in Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Indianapolis AA was adequate. In 2006, HNB was ranked ninth out of 46 institutions (80th percentile) with a 2.67 percent market share in deposits. In 2005, the bank had a HMDA market share of 0.84 percent and was ranked 31st out of 634 lenders (95th percentile). The bank had a small business market share ranking of 13th out of 99 lenders (87th percentile) with 2.10 percent market share. Prior years reflected similar market share percentages and rankings. The Indianapolis AA is a highly competitive area for financial services, and HNB's market penetration and volume was adequate.

Analysis for the Lending Test in the Indianapolis AA rested primarily on home mortgage and small business lending. In evaluating the bank's lending to borrowers of different income levels, we considered the difficulty that low-income borrowers have in obtaining home mortgage loans. The AA had a significant percentage of households living below the poverty

level. Our evaluation of HNB's performance in lending to low-income borrowers improved when considering these mitigating factors. Community development lending had a positive impact on the Lending Test rating.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

During the evaluation period, the geographic distribution of home purchase loans was good.

The geographic distribution of home purchase loans in low-income geographies was excellent. Loans made in low-income geographies greatly exceeded the percentage of owner-occupied units in low-income geographies. The bank's market share of home purchase loans in low-income geographies significantly exceeded the bank's overall home purchase market share in the AA and was excellent.

Overall, the geographic distribution of home purchase loans in moderate-income geographies was adequate. The distribution of home purchase loans in moderate-income geographies was somewhat lower than the percentage of owner-occupied units and represented an adequate level of lending. The bank's market share of home purchase loans in moderate-income geographies substantially met the bank's overall home purchase market share in the AA and was good.

The geographic distribution of home improvement loans during the evaluation period was good.

The geographic distribution of home improvement loans in low-income geographies exceeded the percentage of owner-occupied units in those geographies and was excellent. The bank's market share of home improvement loans in low-income geographies was lower than the bank's overall home improvement lending market share in the AA and was poor.

The geographic distribution of home improvement loans in moderate-income geographies was near to the percentage of owner-occupied units in those geographies and was good. HNB's market share of home improvement loans in moderate-income geographies exceeded the overall home improvement lending market share in the AA and was excellent.

Home refinance loan geographic distribution was poor for the evaluation period in the Indianapolis AA.

The geographic distribution of home refinance loans in both low- and moderate-income geographies was poor with the percentages of loans originated in low- and moderate-income geographies lower than the percentages of owner-occupied units in those geographies. The bank's market share of home refinance loans in low-income geographies substantially met the bank's overall home refinance market share and considered good. HNB's market share of

home refinance loans in moderate-income geographies was somewhat lower than the bank's overall home refinance market share and considered adequate.

Small Loans to Businesses

Refer to Table 6 for the State of Indiana in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to businesses.

The geographic distribution of small loans to businesses in the Indianapolis AA was good. Geographic distribution of small loans to businesses in low-income geographies was good. The percentage of loans originated in low-income geographies was near to the percentage of small businesses in low-income geographies. The bank's market share of small loans to businesses in low-income geographies significantly exceeded the bank's overall market share of small loans to businesses and considered excellent.

The geographic distribution of small loans to businesses in moderate-income geographies was good. The distribution of small loans to businesses in moderate-income geographies was near to the percentage of small businesses located in moderate-income geographies. The bank's market share of small loans to businesses in moderate-income geographies substantially met the bank's overall market share for small loans to businesses and was good.

Lending Gap Analysis

There were no significant unexplained conspicuous lending gaps identified within the Indianapolis AA. Reports detailing HNB's lending activity over the evaluation period were reviewed to identify gaps in the geographic distribution of those loans. All low-income and moderate-income tracts had HMDA or small business loan activity during the evaluation period.

Inside/Outside Ratio

This ratio is a bank wide calculation and is not calculated by individual rating area or AA. During the evaluation period, 67.28 percent of the HMDA loans were originated inside the bank's designated AAs, and 86.53 percent of the small business loans were originated inside the bank's AAs. This distribution of loans was considered good and positively impacted the overall geographic distribution evaluation.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 for the State of Indiana in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. Borrower distribution to low-income borrowers was evaluated taking into context the level of low-income families living below the poverty level.

During the evaluation period, borrower distribution of home purchase loans was excellent in the Indianapolis AA.

Borrower distribution of home purchase loans to low-income borrowers was somewhat lower than the percentage of low-income families and considered adequate. The bank's market share of home purchase loans to low-income borrowers significantly exceeded the bank's overall home purchase market share and was excellent.

Borrower distribution of home purchase loans to moderate-income borrowers greatly exceeded the percentage of moderate-income families and was excellent. The bank's market share of home purchase loans to moderate-income borrowers substantially met the bank's overall home purchase market share and was good.

The borrower distribution of home improvement loans during the evaluation period was excellent.

The borrower distribution of home improvement loans to low- and moderate-income borrowers exceeded the percentages of owner-occupied units in those geographies and was excellent. The bank's market share of home improvement loans to low- and moderate-income borrowers exceeded the bank's overall home improvement lending market share and was excellent.

Home refinance loan borrower distribution was excellent for the evaluation period in the Indianapolis AA.

Borrower distribution of home refinance loans to low-income borrowers was somewhat lower than the percentage of low-income families and considered adequate. The bank's market share of home refinance loans to low-income borrowers greatly exceeded the bank's overall home refinance market share and was excellent.

Overall, borrower distribution of home refinance loans to moderate-income borrowers was excellent. The distribution of home refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families and considered excellent. The bank's market share of home refinance loans to moderate-income borrowers was somewhat lower than the bank's overall home refinance market share and considered adequate.

Small Loans to Businesses

Refer to Table 11 for the State of Indiana in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Borrower distribution of small loans to businesses in the Indianapolis AA was good. The percentage of loans to small businesses substantially met the percentage of small businesses and considered good. The bank's market share of small loans to businesses greatly exceeded its overall business loan market share and considered excellent. The bank made a majority of its small loans to businesses in amounts below \$100 thousand.

Community Development Lending

Refer to Table 1 Lending Volume for State of Indiana in Appendix D for the facts and data used to evaluate the bank's level of community development lending.

During the evaluation period, the bank's level of community development lending was excellent and had a positive impact on the Lending Test rating. HNB made 19 qualified community development loans in the Indianapolis AA for a total of \$46.7 million dollars. The bank's community development loans consisted of eight economic development loans, two loans for affordable housing, one multi-family unit loan, one loan that supported revitalization efforts, and seven loans to organizations whose primary purpose was to provide community development services to low- and moderate-income people within the Indianapolis AA.

Product Innovation and Flexibility

In addition to the standard mix of loan products, HNB offered loan products with flexible terms. These products were not considered innovative and had a neutral impact on the overall evaluation of the bank's lending performance in the AA. During the evaluation period, the bank made 131 FHA loans and 18 VA loans in the Indianapolis AA. The bank also made 59 FNMA flexible term loans and 77 loans under special state loan programs. HNB originated 212 loans in the AA that were retained within its portfolio because the loan's terms were not immediately saleable in the secondary market. In total, during the evaluation period HNB originated 1,001 loans with flexible underwriting standards or terms for over \$122 million throughout the Indianapolis AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Anderson AA and Lafayette AA was weaker than the bank's overall Lending Test performance in the State of Indiana. The bank's performance was weaker in Benton Harbor AA due to weaker lending distribution and weaker CD lending. In the Grand Rapids AA, the bank's performance was weaker primarily due to weaker borrower distribution and weaker CD lending.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Indiana is rated Outstanding. Based on the full-scope review, the bank's performance in the Indianapolis AA was excellent. Refer to Table 14 in the State of Indiana section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments. Refer to the Indianapolis AA Market Profile in Appendix C for details of identified opportunities and needs in the AA.

HNB provided qualified investments within its AA through purchases of securities, cash contributions, and grants. HNB originated five investments in the AA totaling \$2.8 million during the evaluation period. We considered these investments, along with the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balances on two prior period investments as of year-end 2006 totaled nearly \$747 thousand.

HNB also made donations and grants to organizations with a community development focus during the evaluation period. HNB made 36 contributions to 15 different community development organizations, totaling almost \$100 thousand.

HNB's qualified investments were responsive to the identified needs of the AA. The investments addressed the identified needs for affordable housing and community services. They were routine and non-complex in nature. To provide perspective regarding the relative level of qualified investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits. The volume of total funded investments represented approximately 5.8 percent of the allocated Tier One Capital.

HNB made current period investments totaling \$307 thousand in a broader regional area. Those investments had no potential to benefit to the AA. In addition, there was one prior period statewide/regional investment for \$437 thousand that had the potential to benefit the AA.

HNB had nearly \$574 thousand in unfunded commitments to organizations within the AA. HNB also had \$20 thousand in unfunded commitments with the potential to benefit the AA. We considered HNB's unfunded commitments as performance context information for the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Anderson AA was weaker than the bank's overall performance under the Investment Test in the State of Indiana. In the Lafayette AA, the bank's performance was not inconsistent with the bank's overall performance in the state. Performance in these AAs did not have a significant impact on the overall conclusion for Indiana. Refer to Table 14 in the State of Indiana section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Review

HNB's performance under the Service Test in Indiana is rated High Satisfactory. Based on the full-scope review, the bank's performance in the Indianapolis AA was good.

Retail Banking Services

HNB's systems for delivering retail banking services in the State of Indiana were accessible to geographies and individuals of different income levels. The bank offered good accessibility to its service delivery systems in the Indianapolis AA. Refer to Table 15 in the State of Indiana section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB had one branch in a low-income geography and three branches in moderate-income geographies. The percentage of branches in low-income geographies was near to the percentage of the population in the AA in low-income geographies. The percentage of the bank's branches in moderate-income geographies was somewhat below the percentage of the population in the AA area residing in these geographies.

HNB's opening and closing of branches in the Indianapolis AA generally did not adversely affect the accessibility of delivery systems to low- and moderate-income individuals and geographies. HNB opened two branches in the AA during the evaluation period. One was in a middle-income geography, and the other was in an upper-income geography.

The bank's hours and services offered throughout the AA were good. Hours and services offered in the bank's branches were consistent and did not vary in a way that inconvenienced people within the AA, particularly low- and moderate-income areas. In addition to offering Monday through Friday banking hours, many branches offered Saturday banking hours. Branch personnel were also available for appointments outside the standard service hours. Management periodically reviewed business hours to ensure they met the needs of the local community.

Alternative Delivery Systems

The bank's ATM network offered a reasonably effective alternative system for delivering retail banking services to low- and moderate-income individuals and geographies. In addition to ATMs at the majority of its offices, HNB offered ATMs in convenience and grocery stores in the AA. HNB operated 61 ATMs in the Indianapolis AA. The percentages of ATMs located in low-income geographies (3.28 percent) and in moderate-income geographies (19.67 percent) were somewhat below the percentage of the population in those geographies.

HNB offered other alternative delivery systems, including banking by telephone and internet banking. Telephone banking services were available 24 hours a day via a toll-free telephone number. This service allowed customers to open accounts, apply for loans, and access deposit and loan information. Telephone banking services were offered in English and Spanish. Internet banking services are also available 24 hours a day. This service allowed customers to access account balances, download account transaction information, transfer funds, apply for loans and new accounts, and pay bills. No information was available on the effectiveness of these services in reaching low- and moderate-income individuals or geographies. We did not place significant weight on these systems when drawing conclusions under the Service Test.

Community Development Services

HNB's performance in providing Community Development (CD) services in the Indianapolis AA was adequate. Bank management and employees invested an adequate amount of time and effort in CD programs targeted to low- and moderate-income individuals and geographies within HNB's AA. Over 43 hours of CD services were provided to two organizations during the evaluation period. These services include providing community services directed to low- and moderate-income individuals and providing technical expertise to a nonprofit organization.

The following are examples of CD services performed in this AA during the evaluation period:

- One employee served on the board of directors and was a member of the allocations committee for the United Way of Johnson County, Indiana. This United Way chapter supports agencies that provide emergency assistance, crisis intervention, counseling and other health and social services targeted to low- and moderate-income individuals.

- Four employees provided mortgage, financial, and credit counseling services at several home buyer fairs sponsored by the Indiana Neighborhood Housing Partnership (INHP). The INHP was established as a non-profit organization and is charged with developing strategies to address the housing needs of low- and moderate-income citizens.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Anderson AA was stronger than, and in the Lafayette AA was not inconsistent with, the bank's overall "High Satisfactory" performance under the Service Test in Indiana. This was based on HNB's distribution of branches within these AAs. Since only five percent of HNB's deposits are from the Anderson AA, performance in the AA did not impact the overall rating. Refer to Table 15 in the State of Indiana section of Appendix D for the facts and data that support these conclusions.

State of Michigan

CRA Rating for Michigan⁴:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- The volume of lending demonstrated good responsiveness to community needs.
- Lending distribution was good among geographies of different income levels.
- Overall, the lending distribution of lending to borrowers of different income levels was excellent.
- Community development lending was excellent and had a positive impact on the overall Lending Test rating.
- HNB had an excellent distribution of delivery systems that are accessible to individuals and geographies of different income levels.
- The bank provided a good level of CD services that had a positive impact on low- and moderate-income individuals.
- HNB had an adequate level of qualified investments.

Description of Institution's Operations in Michigan

HNB had nine AAs within the State of Michigan. They included the Detroit-Warren AA, the Benton Harbor AA, the Detroit-Wayne AA, the Dowagiac AA, the Grand Rapids AA, the Holland-Grand Haven AA, the Kalamazoo AA, the Muskegon AA, and an AA of the combined non-metropolitan areas. HNB had 115 branches within the state, representing 28.4 percent of the bank's total branch network. Six new branches were opened in the state during the evaluation period, and nine were closed.

As of June 30, 2006, the bank ranked eighth within the state in total deposits with a 3.37 percent market share. HNB's deposits totaled \$5.143 billion. Deposit competitors include LaSalle, Comerica, JPMorgan Chase, and Fifth Third.

Based on deposits, Michigan was HNB's second largest rating area out of its six rating areas and accounted for approximately 21.20 percent of total bank deposits. During the evaluation

⁴ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

period, HNB originated 28.67 percent of its total reportable HMDA loans and small loans to businesses in Michigan.

Refer to the Market Profile for the State of Michigan in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Michigan

We conducted a full-scope review of the Detroit-Warren AA. This AA had 43.87 percent of the bank's deposits within the state and accounted for approximately 18.99 percent of HMDA lending. The AA also had 33.49 percent of small loans to businesses originated by the bank in the state during the evaluation period. As of December 31, 2006, the Detroit-Warren AA had 33.91 percent of the bank's branches within the state. We based our ratings for the State of Michigan primarily on the results of our analysis of the AA selected for full-scope review because the AA had the highest percentage of deposits in Michigan as compared to all of HNB's other AAs in Michigan. Refer to the Market Profiles in Appendix C for detailed demographics and other performance context information for the full-scope AA.

We conducted limited-scope reviews of the Benton Harbor AA, the Detroit-Wayne AA, the Dowagiac AA, the Grand Rapids AA, the Holland-Grand Haven AA, the Kalamazoo AA, the Muskegon AA, and an AA of the combined non-metropolitan areas.

We considered input received from community contacts. The four organizations contacted were involved primarily with affordable housing and economic development. They stated that significant needs included affordable housing; financial literacy/foreclosure prevention programs; affordable home improvement loans; and community services targeted to low- or moderate-income persons, including employment training and child care. We considered these needs in our evaluation of HNB's performance in the State of Michigan.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of Michigan is rated Outstanding. Based on a full-scope review, the bank's Lending Test performance in the Detroit-Warren AA was excellent.

Lending Activity

Refer to Table 1 Lending Volume for the State of Michigan in Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Detroit-Warren AA was good. In 2006, HNB was ranked seventh out of 43 institutions (84th percentile) with a 4.81 percent market share in deposits. In 2005, the bank had a HMDA market share of 0.53 percent and was ranked 40th out of 703 lenders (94th percentile). The bank had a small business market share ranking of 12th out of 106 lenders (89th percentile) with 2.24 percent market share. Prior years reflected similar market share

percentages and rankings. The Detroit-Warren AA is a highly competitive area for financial services and HNB's market penetration and volume was considered good.

Analysis for the Lending Test in the Detroit-Warren AA rested primarily on home mortgage and small business lending. In evaluating the geographic distribution of the bank's home mortgage and small business loans, we gave more weight to the geographic distribution and market share in moderate-income geographies because the Detroit-Warren AA had significantly more moderate-income tracts than low-income tracts and had more opportunities for lending. In evaluating the bank's lending to borrowers of different income levels, we considered the difficulty that low-income borrowers have in obtaining home mortgage loans. The AA had a significant percentage of households living below the poverty level. Our evaluation of HNB's performance in lending to low-income borrowers improved when considering these mitigating factors. Community development lending was a positive lending performance factor for the AA.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

During the evaluation period, the geographic distribution of home purchase loans was good.

The geographic distribution of home purchase loans in low-income geographies was excellent. Loans made in low-income geographies significantly exceeded the percentage of owner-occupied units in those geographies. The bank's market share of home purchase loans in low-income geographies significantly exceeded its overall home purchase market share in the AA and was excellent.

Geographic distribution of home purchase loans in moderate-income geographies was good. Distribution of home purchase loans in moderate-income geographies was near to the percentage of owner-occupied units and was good. The bank's market share of home purchase loans in moderate-income geographies was somewhat lower than the bank's overall home purchase market share in the AA and was adequate.

The geographic distribution of home improvement loans during the evaluation period was good.

The geographic distribution of home improvement loans in low-income geographies was near to the percentage of owner-occupied units in those geographies and was good. The bank's market share of home improvement loans in low-income geographies was lower than the bank's overall home improvement lending market share in the AA and was poor.

The geographic distribution of home improvement loans in moderate-income geographies exceeded the percentage of owner-occupied units in those geographies and was excellent.

The bank's market share of home improvement loans in moderate-income geographies exceeded the overall home improvement lending market share and was excellent.

Home refinance loan geographic distribution was adequate for the evaluation period in the Detroit-Warren AA.

The geographic distribution of home refinance loans in low-income geographies was poor as the percentage of refinance lending in low-income geographies was lower than the percentage of owner-occupied units in low-income geographies. HNB's market share of home refinance loans in low-income geographies was lower than the bank's overall home refinance market share in the AA and was poor.

The geographic distribution of home refinance loans in moderate-income geographies was adequate. The distribution of home refinance loans in moderate-income geographies was somewhat lower than the percentage of owner-occupied units. The bank's market share of home refinance loans in moderate-income geographies substantially met the bank's overall home refinance market share and was good.

Small Loans to Businesses

Refer to Table 6 for the State of Michigan 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 in the Detroit-Warren AA was excellent. The geographic distribution of small loans to businesses in both low- and moderate-income geographies was excellent; the percentages of loans originated in low- and moderate-income geographies greatly exceeded the percentages of small businesses located in low- and moderate-income geographies. The bank's market share of small loans to businesses in low- and moderate-income geographies also greatly exceeded the bank's overall market share of small loans to businesses and was excellent.

Lending Gap Analysis

There were no significant unexplained conspicuous lending gaps identified within the Detroit-Warren AA. Reports detailing HNB's lending activity over the evaluation period were reviewed to identify gaps in the geographic distribution of those loans. Three low-income tracts and one moderate-income tract did not have any HMDA or small business loan activity during the evaluation period. The low-income tracts contained only twelve owner-occupied housing units or 0.002 percent of the owner-occupied housing units in the AA and 143 small businesses or 0.15 percent of the small businesses located in the AA. The moderate-income tract contained six owner-occupied housing units and eight small businesses.

Inside/Outside Ratio

This ratio is a bank wide calculation and is not calculated by individual rating area or AA. During the evaluation period, 67.28 percent of the HMDA loans were originated inside the bank's designated AAs, and 86.53 percent of the small business loans were originated inside

the bank's AAs. This distribution of loans was good and positively impacted the overall geographic distribution evaluation.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 for the State of Michigan in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. Borrower distribution to low-income borrowers was evaluated taking into context the level of low-income families living below the poverty level.

During the evaluation period, borrower distribution of home purchase loans was excellent in the Detroit-Warren AA.

Borrower distribution of home purchase loans to low-income borrowers exceeded the percentage of low-income families and was excellent. The bank's market share of home purchase loans to low-income borrowers exceeded the bank's overall home purchase market share and was excellent.

Borrower distribution of home purchase loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and was excellent. HNB's market share of home purchase loans to moderate-income borrowers substantially met the bank's overall home purchase market share in the AA and was good.

The borrower distribution of home improvement loans during the evaluation period was excellent.

The borrower distribution of home improvement loans in low-income geographies exceeded the percentage of low-income families and was excellent. The bank's market share of home improvement loans to low-income borrowers exceeded its overall home improvement lending market share and was excellent.

The geographic distribution of home improvement loans in moderate-income geographies exceeded the percentage of moderate-income families in those geographies and was excellent. The bank's market share of home improvement loans to moderate-income borrowers was somewhat lower than the overall home improvement lending market share and was adequate.

Home refinance loan borrower distribution was excellent for the evaluation period in the Detroit-Warren AA.

Borrower distribution of home refinance loans to low-income borrowers exceeded the percentage of low-income families and was excellent. The bank's market share of home refinance loans to low-income borrowers greatly exceeded the bank's overall home refinance market share in the AA and was excellent.

Overall, borrower distribution of home refinance loans to moderate-income borrowers was excellent. The distribution of home refinance loans to moderate-income borrowers greatly exceeded the percentage of moderate-income families and was excellent. The bank's market share of home refinance loans to moderate-income borrowers substantially met the bank's overall home refinance market share and was good.

Small Loans to Businesses

Refer to Table 11 for the State of Michigan in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Borrower distribution of small loans to businesses in the Detroit-Warren AA was good. The percentage of loans to small businesses was near to the percentage of small businesses and was good. The bank's market share of small loans to businesses greatly exceeded its overall business loan market share and was excellent. The bank made a majority of its small loans to businesses in amounts below \$100 thousand.

Community Development Lending

Refer to Table 1 Lending Volume for the State of Michigan in Appendix D for the facts and data used to evaluate the bank's level of community development lending.

During the evaluation period, the bank's level of CD Lending was excellent and had a positive impact on the overall evaluation of its lending performance in the Detroit-Warren AA. HNB made twelve qualified community development loans in the Detroit-Warren AA for a total of \$65.6 million dollars. The bank's community development loans consisted of three economic development loans, three loans for affordable housing, three loans that supported revitalization efforts, and three loans to organizations whose primary purpose was to provide community development services to low- and moderate-income people within the Detroit-Warren AA.

Product Innovation and Flexibility

In addition to the standard mix of loan products, HNB offered loan products with flexible terms. These products were not considered innovative and had a neutral impact on the overall evaluation of the bank's lending performance in the AA. During the evaluation period, the bank made 27 FHA loans and 3 VA loans in the Detroit-Warren AA. The bank also made 60 FNMA flexible term loans and 15 loans under special state loan programs. HNB originated 41 loans in the AA that were retained within its portfolio due to terms not immediately saleable in the secondary market. In total, during the evaluation period HNB originated 578 loans with flexible underwriting standards or terms for over \$94 million extended throughout the Detroit-Warren AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Detroit-Wayne AA, the Holland-Grand Haven AA, the Kalamazoo AA, the Muskegon AA, and the combined non-metropolitan AA was not inconsistent with the bank's overall Lending Test

performance in Michigan. The bank's performance in the Benton Harbor AA, the Dowagiac AA, and the Grand Rapids AA was weaker than the bank's overall Lending Test performance in the State of Michigan. The bank's performance was weaker in Benton Harbor AA and the Grand Rapids AA due to weaker lending distribution. In the Dowagiac AA, the bank's performance was weaker primarily due to weaker loan volume and weaker CD lending. Refer to the Tables 1 through 13 in the State of Michigan section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Michigan is rated Low Satisfactory. The bank's performance in the Detroit-Warren AA was adequate based on the full-scope review of the AA. Refer to Table 14 in the State of Michigan section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments. Refer to the AA Market Profile in Appendix C for details of identified opportunities and needs in the AA.

During the evaluation period, HNB provided qualified investments within its AA through purchases of securities, cash contributions, and grants. HNB originated two investments in the AA totaling \$2.9 million. We considered these investments, along with the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balances on prior period investments as of year-end 2006 totaled nearly \$30 thousand.

HNB also made donations and grants to organizations with a community development focus during the evaluation period. HNB made 34 contributions to 10 different community development organizations, totaling nearly \$78 thousand during the evaluation period.

HNB's qualified investments were responsive to the identified needs of the AA. The investments addressed the identified needs for affordable housing and community services. They were routine and non-complex in nature. To provide perspective regarding the relative level of qualified investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits. Within the Detroit-Warren AA, HNB's volume of total funded investments represented approximately 1.6 percent of the allocated Tier One Capital.

HNB had almost \$79 thousand in unfunded commitments to organizations within the AA. We considered HNB's unfunded commitments as performance context information for the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Dowagiac, Grand Rapids, Holland-Grand Haven, Kalamazoo, and the combined non-metropolitan AA was not inconsistent with the bank's overall performance in the State of Michigan. The bank's performance under the Investment Test in the Benton Harbor and Detroit-Wayne AAs was stronger than the bank's overall performance under the Investment Test in the state. The bank's performance under the Investment Test in the Muskegon AA was weaker than the bank's overall performance under the Investment Test in the state. Performance in these AAs did not have a significant impact on the overall conclusion for

Michigan. Refer to Table 14 in the State of Michigan section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Review

HNB's performance under the Service Test in Michigan is rated Outstanding. Based on the full-scope review, the bank's performance in the Detroit-Warren AA was excellent.

Retail Banking Services

HNB's systems for delivering retail banking services in the State of Michigan were readily accessible to geographies and individuals of different income levels. The bank had excellent accessibility of its service delivery systems in the Detroit-Warren AA. Refer to Table 15 in the State of Michigan section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB had 39 full-service branches in the AA. The bank did not have any branches in low-income geographies. However, only 1.86 percent of the AA population lived within these geographies. Ten branches, representing 25.64 percent of the bank's branches, were located in moderate-income geographies. The percentage of the bank's branches in moderate-income geographies exceeded the percentage of the population residing in those geographies.

HNB's opening and closing of branches in the Detroit-Warren AA generally had not adversely affected the accessibility of delivery systems to low- and moderate-income individuals and geographies. HNB opened three branches and closed one branch during the evaluation period. However, none of these was in low- or moderate-income geographies.

The bank's hours and services offered throughout the assessment area were good. There were only minor differences in the bank's services and business hours throughout the AA, none of which adversely affected low- or moderate-income geographies or individuals. In addition to offering Monday through Friday banking hours, many branches offered Saturday banking hours. Branch personnel were also available for appointments outside the standard service hours. Management periodically reviewed business hours to ensure they met the needs of the local community.

Alternative Delivery Systems

The bank's ATM network offered an effective alternative system for delivering retail banking services to low- and moderate-income individuals and geographies. In addition to ATMs at the majority of its offices, HNB offered ATMs in convenience and grocery stores in the AA. HNB operated 93 ATMs in the Detroit-Warren AA. HNB did not have any ATMs in low-income geographies, but only 1.86 percent of the population lived in these geographies. The percentage of ATMs located in moderate-income geographies (22.58 percent) exceeded the percentage of the population in those geographies.

HNB offered other alternative delivery systems, including banking by telephone and internet banking. Telephone banking services were available 24 hours a day via a toll-free telephone number. This service allowed customers to open accounts, apply for loans, and access deposit and loan information. Telephone banking services were offered in English and Spanish. Internet banking services were also available 24 hours a day. This service allowed customers to access account balances, download account transaction information, transfer funds, apply for loans and new accounts, and pay bills. No information was available on the effectiveness of these services in reaching low- and moderate-income individuals or geographies. We did not place significant weight on these systems when drawing conclusions under the Service Test.

Community Development Services

HNB's performance in providing Community Development (CD) services in the Detroit-Warren AA was good. Bank management and employees provided a relatively high level of CD services targeted to low- and moderate-income individuals and geographies within HNB's AA. Over 480 hours of CD services were provided to 22 organizations during the evaluation period. These services included providing credit counseling, first-time homebuyer seminars, technical expertise to nonprofit or government organizations, and financial education.

The following are examples of CD services performed in this AA during the evaluation period:

- One employee was on the board of directors and finance committee of the Oakland Livingston Human Services Agency (OLHSA). Several other employees participated in financial literacy and first-time homebuyer seminars to clients of OLHSA. OLHSA focuses on providing educational and economic resources to low-income individuals to help reduce the causes and effects of poverty.
- Two employees participated in several first-time homebuyer seminars for clients of the Lighthouse of Oakland County. This organization provided immediate and long-term help and support to low-income families and individuals. This included emergency and supplemental food, permanent housing, counseling, education and more.
- One employee was on the board of directors of the Women's Survival Center of Oakland County. This organization provided legal assistance, counseling, information, and referral and childcare services to women and families that are the victims of domestic abuse.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Benton Harbor, Detroit-Wayne, Dowagiac, Kalamazoo AAs and the combined non-metropolitan AA was not inconsistent with the bank's overall outstanding performance under the Service Test in Michigan. The bank's performance in the Grand Rapids, Holland-Grand Haven and Muskegon AAs was weaker than its overall performance because the branch and ATM network in these AAs were not as accessible to low- and moderate-income individuals. This did not negatively impact the overall rating because the combined percentages of the population in low- and moderate-income geographies in these AAs are 2.03 percent and 16.03 percent, respectively.

Refer to Table 15 in the State of Michigan section of Appendix D for the facts and data that support these conclusions.

State of Ohio

CRA Rating for Ohio⁵:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- The volume of lending demonstrated adequate responsiveness to community needs within the AAs.
- Lending distribution was adequate among geographies of different income levels.
- Lending distribution was good among borrowers of different income levels.
- The excellent level of CD lending had a positive impact on the bank's lending performance.
- HNB had a good distribution of delivery systems that were accessible to individuals and geographies of different income levels.
- The bank provided a good level of CD services that had a positive impact on low and moderate-income individuals.
- HNB had an adequate level of qualified investments.

Description of Institution's Operations in Ohio

HNB had twelve AAs within the State of Ohio. They included the Columbus AA, the Akron AA, the Canton AA, the Cleveland AA, the Dayton AA, the Green AA, the Lima AA, the Mansfield AA, the Springfield AA, the Toledo AA, the Wadsworth/Medina AA, and an AA of the combined non-metropolitan areas. HNB had 198 branches within the state, representing 48.89 percent of the bank's total branch network. Ten new branches were opened in Ohio during the evaluation period, and fifteen were closed.

As of June 30, 2003, the bank ranked fourth in total state deposits with a 7.8 percent market share. HNB's statewide deposits totaled \$16.2 billion. Deposit competitors include Fifth Third, National City, Key Bank, and JPMorgan Chase.

⁵ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Based on deposits, Ohio was the largest state rating area and accounted for approximately 62.62 percent of total bank deposits. During the evaluation period, HNB originated 48.27 percent of its total reportable HMDA loans and small loans to businesses in Ohio.

Refer to the Market Profile for the State of Ohio in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

Scope of Evaluation in Ohio

We conducted a full-scope review of the Columbus AA. This AA had 54.65 percent of the bank's deposits and accounted for approximately 49.82 percent of HMDA lending. This AA also had 40.50 percent of small loans to businesses originated by the bank in the state during the evaluation period. As of December 31, 2006, the Columbus AA had 29.29 percent of the bank's branches within the state. We based ratings for the State of Ohio primarily on the results of our analysis of the Columbus AA because this AA was the largest in the state based upon deposit and loan volume. Refer to the Market Profiles in Appendix C for detailed demographics and other performance context information for the full-scope AA.

We conducted limited-scope reviews of the Akron AA, the Canton AA, the Cleveland AA, the Dayton AA, the Green AA, the Lima AA, the Mansfield AA, the Springfield AA, the Toledo AA, the Wadsworth/Medina AA, and an AA of the combined non-metropolitan areas.

We considered input received from community contacts. The organizations contacted were involved primarily with affordable housing and community services. They stated that significant needs for the Columbus AA include affordable housing; construction financing; flexible mortgage programs; financial literacy/foreclosure prevention programs; and community services targeted to low- or moderate-income persons, including employment training and child care. We considered these needs in our evaluation of HNB's performance in the State of Ohio.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of Ohio is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Columbus AA was good.

Lending Activity

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 lending activity.

Lending activity in the Columbus AA was adequate. In 2006, HNB was ranked first out of 55 institutions with a 28.91 percent market share in deposits. In 2005, the bank had a HMDA market share of 4.15 percent and was ranked second out of 579 lenders (99th percentile). The bank had a small business market share ranking of sixth out of 90 lenders (93rd percentile) with

7.16 percent market share. Prior years reflected similar market share percentages and rankings. The Columbus AA is a highly competitive area for financial services, and HNB's market penetration and volume was good.

Analysis for the Lending Test in the Columbus AA rested on home mortgage and small business lending. In evaluating the geographic distribution of the bank's home mortgage and small business loans, we gave more weight to the geographic distribution and market share in moderate-income geographies because the Columbus AA had significantly more moderate-income tracts than it had low-income tracts and more opportunities for lending within the moderate-income geographies. In evaluating the bank's lending to borrowers of different income levels, we considered the difficulty that low-income borrowers have in obtaining home mortgage loans. The AA had a significant percentage of households living below the poverty level. Our evaluation of HNB's performance in lending to low-income borrowers improved when considering these mitigating factors. Community development lending was a positive lending performance factor in the AA.

Distribution of Loans by Income Level of the Geography

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 and purchases.

During the evaluation period, the geographic distribution of home purchase loans was adequate.

Overall, the geographic distribution of home purchase loans in low-income geographies was excellent. Loans made in low-income geographies exceeded the percentage of owner-occupied units in low-income geographies. The bank's market share of home purchase loans in low-income geographies was somewhat lower than the bank's overall home purchase market share in the AA and was adequate.

The geographic distribution of home purchase loans in moderate-income geographies was poor. The distribution of home purchase loans in moderate-income geographies was lower than the percentage of owner-occupied units. HNB's market share of home purchase loans in moderate-income geographies was also lower than its overall home purchase market share within the AA and was poor.

The geographic distribution of home improvement loans during the evaluation period was excellent.

The geographic distribution of home improvement loans in low-income geographies exceeded the percentage of owner-occupied units in those geographies and was excellent. The bank's market share of home improvement loans in low-income geographies exceeded the bank's overall home improvement lending market share and was excellent.

The geographic distribution of home improvement loans in moderate-income geographies exceeded the percentage of owner-occupied units in those geographies and was excellent. The bank's market share of home improvement loans in moderate-income geographies substantially met the bank's overall home improvement lending market share and was good.

Home refinance loan geographic distribution was adequate for the evaluation period in the Columbus AA.

The geographic distribution of home refinance loans in low-income geographies was excellent. Loans made in low-income geographies exceeded the percentage of owner-occupied units in low-income geographies. The bank's market share of home refinance loans in low-income geographies also exceeded the bank's overall home refinance market share in the AA and was excellent.

Overall, the geographic distribution of home refinance loans in moderate-income geographies was poor. The distribution of home refinance loans in moderate-income geographies was lower than the percentage of owner-occupied units in those geographies. The bank's market share of home refinance loans in moderate-income geographies was somewhat lower than the bank's overall home refinance market share and was adequate.

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.

The geographic distribution of small loans to businesses in the Columbus AA was good. The geographic distribution of small loans to businesses in low-income geographies was good. The percentage of loans originated in low-income geographies was near to the percentage of small businesses located in low-income geographies. The bank's market share of small loans to businesses in low-income geographies exceeded the bank's overall market share of small loans to businesses and was excellent.

The geographic distribution of small loans to businesses in moderate-income geographies was good as the percentage of loans originated in moderate-income geographies was near to the percentage of small businesses in moderate-income geographies. The bank's market share of small loans to businesses in moderate-income geographies exceeded the bank's overall market share of small loans to businesses and was excellent.

Lending Gap Analysis

There were no significant unexplained conspicuous lending gaps identified within the Columbus AA. Reports detailing HNB's lending activity over the evaluation period were reviewed to identify gaps in the geographic distribution of those loans. There were no low-income tracts that did not have any HMDA or small business loan activity during the evaluation period. There was only one moderate-income tract without any HMDA or small business loan activity during the evaluation period. The one census tract contains 129 owner-occupied housing units or 0.03 percent of the owner-occupied housing units in the AA and 40 small businesses or 0.07 percent of the small businesses located in the AA.

Inside/Outside Ratio

This ratio is a bank wide calculation and is not calculated by individual rating area or AA. During the evaluation period, 67.28 percent of the HMDA loans were originated inside the bank's designated AAs, and 86.53 percent of the small business loans were originated inside the bank's AAs. This distribution of loans was considered good and positively impacted the overall geographic distribution evaluation.

Distribution of Loans by Income Level of the Borrower

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. Borrower distribution to low-income borrowers was evaluated taking into context the level of low-income families living below the poverty level.

During the evaluation period, borrower distribution of home purchase loans was good in the Columbus AA.

Borrower distribution of home purchase loans to low-income borrowers was lower than the percentage of low-income families and was poor. The bank's market share of home purchase loans to low-income borrowers was somewhat lower than the bank's overall home purchase market share in the AA and was adequate.

Borrower distribution of home purchase loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families and was excellent. The bank's market share of home purchase loans to moderate-income borrowers also exceeded the bank's overall home purchase market share and was excellent.

The borrower distribution of home improvement loans during the evaluation period was excellent.

The borrower distribution of home improvement loans to low-income borrowers exceeded the percentage of low-income families and was excellent. The bank's market share of home improvement loans to low-income borrowers exceeded the bank's overall home improvement lending market share in the AA and was excellent.

The borrower distribution of home improvement loans to moderate-income borrowers exceeded the percentage of moderate-income families and was excellent. The bank's market share of home improvement loans to moderate-income borrowers substantially met the overall home improvement lending market share and was good.

Home refinance loan borrower distribution was good for the evaluation period in the Columbus AA.

Borrower distribution of home refinance loans to low-income borrowers was lower than the percentage of low-income families and was poor. The bank's market share of home refinance

loans to low-income borrowers exceeded the bank's overall home refinance market share and was excellent.

Overall, borrower distribution of home refinance loans to moderate-income borrowers was excellent. The distribution of home refinance loans to moderate-income borrowers exceeded the percentage of moderate-income families. The bank's market share of home refinance loans to moderate-income borrowers substantially met the bank's overall home refinance market share and was good.

Small Loans to Businesses

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

Borrower distribution of small loans to businesses in the Columbus AA was excellent. The percentage of loans to small businesses exceeded the percentage of small businesses and was excellent. The bank's market share of small loans to businesses significantly exceeded its overall business loan market share and was excellent. The bank made a majority of its small loans to businesses in amounts below \$100 thousand.

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.

During the evaluation period, the bank's level of community development lending for the area was excellent and had a positive impact on the overall evaluation of its lending performance in the Columbus AA. HNB made 88 qualified community development loans in the Columbus AA for a total of \$96.2 million. The bank's community development loans consisted of seven economic development loans, 21 loans for affordable housing, thirteen loans that supported revitalization efforts, and 47 loans to organizations whose primary purpose was to provide community development services to low- and moderate-income people within the Columbus AA.

Product Innovation and Flexibility

In addition to the standard mix of loan products, HNB offered loan products with flexible terms. These products were not considered innovative and had a neutral impact on the overall evaluation of the bank's lending performance in the AA. During the evaluation period, the bank made 1,961 FHA loans and 110 VA loans in the Columbus AA. The bank also made 695 FNMA flexible term loans and 70 loans under special state loan programs. HNB originated 946 loans in the AA that were retained within its portfolio because the loans' terms rendered them not immediately saleable in the secondary market. In total, during the evaluation period, HNB originated 5,517 loans with flexible underwriting standards or terms for over \$1.1 billion extended throughout the Columbus AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Akron AA, the Toledo AA, the Lima AA, and the combined non-metropolitan AA was stronger than the bank's overall performance due to stronger borrower distribution of lending. The bank's performance in the Canton AA, the Cleveland AA, the Dayton AA, the Mansfield AA, the Springfield AA, and the Wadsworth/Medina AA was not inconsistent with the bank's overall Lending Test performance. HNB's performance in the Green AA was weaker because of weaker geographic distribution of lending.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Ohio was rated Low Satisfactory. Based on the full-scope review, the bank's performance in the Columbus AA was adequate. Refer to Table 14 in the State of Ohio section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments. Refer to the AA Market Profile in Appendix C for details of identified opportunities and needs in the AA.

During the evaluation period, HNB originated twelve investments in the AA totaling \$12.4 million. We considered these investments, along with the ongoing impact that fourteen investments made prior to the current evaluation period had within the AA. As of year-end 2006, the remaining balance on the fourteen prior period investments was almost \$1.3 million.

HNB also made donations and grants to organizations with a community development focus during the evaluation period, HNB made 118 contributions to 42 different community development organizations, totaling nearly \$6.7 million.

HNB's qualified investments were responsive to the identified needs of the AA. The investments addressed the identified needs for affordable housing and community services. They were routine and non-complex in nature. To provide perspective regarding the relative level of qualified investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits. The volume of total funded investments represented approximately 2.9 percent of the allocated Tier One Capital.

HNB had almost \$11 million in unfunded commitments to organizations within the AA. We considered HNB's unfunded commitments as performance context information for the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Akron, Dayton, Springfield, and Toledo AAs was not inconsistent with the bank's overall performance in the State of Ohio. The bank's performance under the Investment Test in Cleveland and Mansfield AAs was stronger than the bank's overall performance in the state. The bank's performance in Canton, Green, Lima, Wadsworth/Medina, and the combined non-metropolitan AA was weaker than the bank's overall performance in the state. Performance in

these AAs did not have a significant impact on the overall conclusion for Ohio. Refer to Table 14 in the State of Ohio section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Review

HNB's performance under the Service Test in Ohio is rated High Satisfactory. Based on the full-scope review, the bank's performance in the Columbus AA was good.

Retail Banking Services

HNB's systems for delivering retail banking services in the Columbus AA were accessible to geographies and individuals of different income levels. Refer to Table 15 in the State of Ohio section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB had a good distribution of delivery systems that were accessible to individuals and geographies of different income levels in the AA. HNB had 58 full-service branches in the Columbus AA. The bank had six branches in low-income geographies and twelve branches in moderate-income geographies in the AA. The percentage of the bank's branches in low-income geographies exceeded, and in moderate-income geographies was near to, the percentage of the population residing in those geographies.

HNB's opening and closing of branches in the Columbus AA generally did not adversely affect the accessibility of delivery systems to low- and moderate-income individuals and geographies. HNB opened eight branches and closed eleven branches during the evaluation period. However, none of these were in low- or moderate-income geographies.

The bank's hours and services offered in the AA were good. Hours and services offered in the bank's branches were consistent and did not vary in a way that inconvenienced people within the AA, particularly low- or moderate-income areas. In addition to offering Monday through Friday banking hours, many branches offered Saturday banking hours. Branch personnel were also available for appointments outside the standard service hours. Management periodically reviewed business hours to ensure they met the needs of the local community.

Alternative Delivery Systems

The bank's ATM network offered an effective alternative system for delivering retail banking services to low- and moderate-income individuals and geographies. In addition to ATMs at the majority of its offices, HNB offered ATMs in convenience and grocery stores in the AA. HNB operated 165 ATMs in the Columbus AA. The percentage of ATMs located in low-income geographies (17.58 percent) exceeds, and in moderate-income geographies (21.82 percent) substantially met, the percentage of the population in those geographies.

HNB offered other alternative delivery systems, including banking by telephone and internet banking. Telephone banking services were available 24 hours a day via a toll-free telephone

number. This service allowed customers to open accounts, apply for loans, and access deposit and loan information. Telephone banking services were offered in English and Spanish. Internet banking services were also available 24 hours a day. This service allowed customers to access account balances, download account transaction information, transfer funds, apply for loans and new accounts, and pay bills. No information was available on the effectiveness of these services in reaching low- and moderate-income individuals or geographies. We did not place significant weight on these systems when drawing conclusions under the Service Test.

Community Development Services

HNB's performance in providing Community Development (CD) services in the Columbus AA was good. Bank management and employees provided a relatively high level of CD services targeted to low- and moderate-income individuals and geographies within HNB's AA. Over 2,350 hours of CD services were provided to 60 organizations during the evaluation period. These services included providing credit counseling, first-time homebuyer seminars, technical expertise to nonprofit or government organizations, and financial education.

The following were examples of CD services performed in this AA during the evaluation period:

- HNB developed a program called "Reality Day." This program provided financial education to students at local high schools. This program was designed to teach students the reality of life after high school. Based on GPA, each student chose a career and was given a monthly income. They were assigned a credit score based on school attendance. The students then made decisions about housing, transportation, food, clothing, insurance, savings, and entertainment. HNB employees, along with representatives from local businesses, guided the students. This program was provided to eight high schools where the majority of students were from low- or moderate-income families.
- HNB partnered with numerous organizations to bring full-service business resources to the community through a six-month curriculum called the Small Business Entrepreneurial Development Program. This program helped 40 prospective small business owners learn what is needed to start and maintain their own businesses and have them be successful.
- Two employees were involved with Columbus Saves. One was on the board of directors, and the other assisted with programs offered by the organization. The goal of this organization is to educate and to assist individuals and families in actively building wealth through saving and debt reduction. They provided workshops, wealth coaching, and access to low- or no-cost savings products to Columbus area residents with an emphasis on low- to moderate-income households and youth.
- Bank personnel established and supervised student-banking programs in eight elementary and middle schools in the AA. The student body of these schools consisted primarily of students from low- and moderate-income families. Students were taught financial literacy and operated a student bank with HNB personnel supervision.

- An employee was on the board of directors of the Community Development Collaborative of Columbus. The Collaborative provides leadership, financial support, training, and direct technical assistance to neighborhood-based community development corporations in the bank's AA.
- Four employees provided financial literacy and first-time homebuyer education programs for the Columbus Housing Partnership. Columbus Housing Partnership provides quality, affordable housing and related services to low- and moderate-income households in Columbus and the surrounding area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Cleveland, Lima, and Springfield AAs was not inconsistent with the bank's overall High Satisfactory rating under the Service Test in Ohio. The bank's performance in the Akron, Canton, Lima, and Springfield AAs was stronger than HNB's overall performance under the Service Test in Ohio because its branch distribution exceeded the percentages of people living in low- and moderate-income geographies in the respective AAs. The bank's performance under the Service Test in the Dayton, Mansfield, Toledo, and non-metropolitan AAs was weaker than the bank's overall performance under the Service Test in Ohio. The bank's performance in these AAs was weaker than its overall performance because the branch and ATM networks in these AAs were not as accessible to low- and moderate-income individuals. The Green and Wadsworth/Medina AAs did not have any low- or moderate-income geographies. The bank's performance in the limited-scope areas had a neutral impact on the overall rating. Refer to Table 15 in the State of Ohio section of Appendix D for the facts and data that support these conclusions.

State of West Virginia

CRA Rating for West Virginia⁶: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: Outstanding

The major factors that support this rating include:

- The volume of lending demonstrated good responsiveness to community needs.
- Lending distribution was good among geographies of different income levels.
- Overall, the distribution of lending to borrowers of different income levels was good.
- HNB had an excellent distribution of delivery systems that were accessible to individuals and geographies of different income levels.
- The bank provided a good level of CD services that had a positive impact on low- and moderate-income individuals.
- HNB had an adequate level of qualified investments.

Description of Institution's Operations in West Virginia

HNB had five AAs within the State of West Virginia. They included the Charleston AA, the Huntington AA, the Morgantown AA, the Parkersburg AA, and an AA of the combined non-metropolitan areas. HNB had 30 branches within the state, representing 7.41 percent of the bank's total branch network. One new branch was opened in West Virginia during the evaluation period, and one was closed.

As of June 30, 2003, the bank ranked 6th in total state deposits with a 7.24 percent market share. HNB's statewide deposits totaled \$1.5 billion. Deposit competitors include Branch Banking & Trust Co, United Bank, Wesbanco Bank, JPMorgan Chase, and City National Bank of West Virginia.

Based on deposits, West Virginia was the 3rd largest state rating area and accounted for approximately 6.39 percent of total bank deposits. During the evaluation period, HNB originated 7.45 percent of its total reportable HMDA loans and small loans to businesses in West Virginia.

⁶ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the Market Profile for the State of West Virginia in Appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

Scope of Evaluation in West Virginia

We conducted a full-scope review of the Charleston AA. This AA had 27.41 percent of the bank's deposits within the state and accounted for approximately 26.69 percent of lending and 40.60 percent of small loans to businesses originated by the bank in the state during the evaluation period. As of December 31, 2006, the Charleston AA had 27 percent of the state's branches. We based ratings for the State of West Virginia primarily on the results of our analysis of the AA selected for full-scope review because this AA had a greater percentage of deposits than any of HNB's other AAs within West Virginia, except for HNB's combined non-metropolitan AA in West Virginia. The Charleston AA was selected for full-scope review, rather than HNB's combined the combined non-metropolitan AA, because a greater percentage of population within the Charleston AA is low- to moderate-income as compared to the combined non-metropolitan AA. Refer to the Market Profiles in Appendix C for detailed demographics and other performance context information for the full-scope AA.

We conducted limited-scope reviews of the Huntington AA, the Morgantown AA, the Parkersburg AA, and the AA of the combined non-metropolitan areas.

We considered input received from community contacts. Community contacts made during the evaluation period indicated that significant needs for the Charleston AA included quality affordable housing, flexible mortgage programs, and financial literacy/foreclosure prevention programs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the State of West Virginia is rated High Satisfactory. Based on a full-scope review, the bank's Lending Test performance in the Charleston AA was good.

Lending Activity

Refer to Table 1 Lending Volume for the State of West Virginia in Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Charleston AA was good. In 2006, HNB was ranked sixth out of 16 institutions (63rd percentile) with a 9.87 percent market share in deposits. In 2005, the bank had a HMDA market share of 4.55 percent and was ranked seventh out of 213 lenders (97th percentile). The bank also had a small business market share ranking of seventh out of 37 lenders (81st percentile) with 6.82 percent market share. Prior years reflected similar market share percentages and rankings. The Charleston AA is a highly competitive area for financial services, and HNB's market penetration and volume was good.

Analysis for the Lending Test in the Charleston AA rested primarily on home mortgage and small business lending. In evaluating the bank's lending to borrowers of different income levels, we considered the difficulty that low-income borrowers have in obtaining home mortgage loans. The AA had a significant percentage of households living below the poverty level. Our evaluation of HNB's performance in lending to low-income borrowers improved when considering these mitigating factors. Community development lending was a neutral lending performance factor for the area.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 for the State of West Virginia in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

During the evaluation period, the geographic distribution of home purchase loans was good.

The geographic distribution of home purchase loans in low-income geographies was excellent. Loans made in low-income geographies significantly exceeded the percentage of owner-occupied units in low-income geographies. The bank's market share of home purchase loans in low-income geographies also significantly exceeded the bank's overall home purchase market share in the AA and was excellent.

The geographic distribution of home purchase loans in moderate-income geographies was adequate. The distribution of home purchase loans in moderate-income geographies was somewhat lower than the percentage of owner-occupied units in those geographies. The bank's market share of home purchase loans in moderate-income geographies exceeded its overall home purchase market share and was excellent.

The geographic distribution of home improvement loans during the evaluation period was adequate.

The geographic distribution of home improvement loans in low-income geographies was lower than the percentage of owner-occupied units in those geographies and was poor. HNB's market share of home improvement loans in low-income geographies was also lower than its overall home improvement lending market share and was poor.

The geographic distribution of home improvement loans in moderate-income geographies exceeded the percentage of owner-occupied units in those geographies and was excellent. The bank's market share of home improvement loans in moderate-income geographies also exceeded the overall home improvement lending market share and was excellent.

Home refinance loan geographic distribution was good for the evaluation period in the Charleston AA.

Overall, the geographic distribution of home refinance loans in low-income geographies was excellent. Loans made in low-income geographies significantly exceeded the percentage of

owner-occupied units in low-income geographies. Market share of home refinance loans in low-income geographies was lower than the bank's overall home refinance market share in the AA and was poor.

The geographic distribution of home refinance loans in moderate-income geographies was adequate. The distribution of home refinance loans in moderate-income geographies was somewhat lower than the percentage of owner-occupied units in those geographies. The bank's market share of home refinance loans in moderate-income geographies significantly exceeded the bank's overall home refinance market share and was excellent.

Small Loans to Businesses

Refer to Table 6 for the State of West Virginia 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 in the Charleston AA was good.

Overall, the geographic distribution of small loans to businesses in low-income geographies was adequate. The percentage of loans originated in low-income geographies was somewhat lower than the percentage of small businesses located in low-income geographies and was adequate. The bank's market share of small loans to businesses in low-income geographies substantially met the bank's overall market share of small loans to businesses in the AA and was good.

The geographic distribution of small loans to businesses in moderate-income geographies was excellent as the percentage of loans originated in moderate-income geographies significantly exceeded the percentage of small businesses located in moderate-income geographies. The bank's market share of small loans to businesses in moderate-income geographies also significantly exceeded the bank's overall market share of small loans to businesses and was excellent.

Lending Gap Analysis

There were no significant unexplained conspicuous lending gaps identified within the Charleston AA. Reports detailing HNB's lending activity over the evaluation period were reviewed to identify gaps in the geographic distribution of those loans. All low-income and moderate-income tracts had HMDA or small business loan activity during the evaluation period.

Inside/Outside Ratio

This ratio is a bank wide calculation and is not calculated by individual rating area or AA. During the evaluation period, 67.28 percent of the HMDA loans were originated inside the bank's designated AAs, and 86.53 percent of the small business loans were originated inside the bank's AAs. This distribution of loans was good and positively impacted the overall geographic distribution evaluation.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 for the State of West Virginia in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. Borrower distribution to low-income borrowers was evaluated taking into context the level of low-income families living below the poverty level.

During the evaluation period, borrower distribution of home purchase loans was good in the Charleston AA.

Borrower distribution of home purchase loans to low-income borrowers was somewhat lower than the percentage of low-income families and was adequate. The bank's market share of home purchase loans to low-income borrowers exceeded the bank's overall home purchase market share and was excellent.

Borrower distribution of home purchase loans to moderate-income borrowers exceeded the percentage of moderate-income families and was excellent. The bank's market share of home purchase loans to moderate-income borrowers significantly exceeded the bank's overall home purchase market share and was excellent.

The borrower distribution of home improvement loans during the evaluation period was excellent.

The borrower distribution of home improvement loans to low-income borrowers exceeded the percentage of low-income families in the AA and was excellent. The bank's market share of home improvement loans to low-income borrowers exceeded the bank's overall home improvement lending market share and was excellent.

The borrower distribution of home improvement loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was excellent. The bank's market share of home improvement loans to moderate-income borrowers was somewhat lower than the overall home improvement lending market share and was adequate.

Home refinance loan borrower distribution was adequate for the evaluation period in the Charleston AA.

Borrower distribution of home refinance loans to low-income borrowers was lower than the percentage of low-income families and was poor. The bank's market share of home refinance loans to low-income borrowers substantially met the bank's overall home refinance market share and was good.

Overall, borrower distribution of home refinance loans to moderate-income borrowers was good. The distribution of home refinance loans to moderate-income borrowers was near to the percentage of moderate-income families. The bank's market share of home refinance loans to moderate-income borrowers exceeded the bank's overall home refinance market share and was excellent.

Small Loans to Businesses

Refer to Table 11 for the State of West Virginia in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Borrower distribution of small loans to businesses in the Charleston AA was adequate. The percentage of loans to small businesses was somewhat lower than the percentage of small businesses and was adequate. The bank's market share of small loans to businesses exceeded its overall business loan market share and was excellent. The bank made a majority of its small loans to businesses in amounts below \$100 thousand.

Community Development Lending

Refer to Table 1 Lending Volume for the State of West Virginia in Appendix D for the facts and data used to evaluate the bank's level of community development lending.

The bank's level of community development lending for the Charleston AA during the evaluation period was adequate and had a neutral impact on the overall evaluation of its lending performance.

Product Innovation and Flexibility

In addition to the standard mix of loan products, HNB offered loan products with flexible terms. These products were not considered innovative and had a neutral impact on the overall evaluation of the bank's lending performance in the AA. During the evaluation period, the bank made 99 FHA loans and 16 VA loans in the Charleston AA. The bank also made 111 FNMA flexible term loans and 169 loans under special state loan programs. HNB originated seven loans in the AA that were retained within its portfolio due to terms not immediately saleable in the secondary market. In total, HNB originated 399 loans with flexible underwriting standards or terms for over \$36 million extended throughout the Charleston AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Huntington AA and in the combined non-metropolitan AA was stronger than the bank's overall performance due to stronger borrower distribution of lending. The bank's performance in the Morgantown AA and the Parkersburg AA was not inconsistent with the bank's overall Lending Test performance.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in West Virginia is rated Low Satisfactory. Based on the full-scope review, the bank's performance in the Charleston AA was adequate. Refer to Table 14 in the State of West Virginia section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments. Refer to the AA Market Profile in Appendix C for details of identified opportunities and needs in the AA.

During the evaluation period, HNB originated three investments in the AA totaling \$1 million. HNB also made donations and grants to organizations with a community development focus. HNB made 22 contributions to eight different community development organizations, totaling \$77 thousand during the evaluation period.

HNB's qualified investments were responsive to the identified needs of the AA. The investments addressed the identified needs for affordable housing and community services. They were routine and non-complex in nature. To provide perspective regarding the relative level of qualified investments, we allocated a portion of the bank's Tier One Capital to each AA based on its pro rata share of deposits. The volume of total investments represented approximately 3.2 percent of the allocated Tier One Capital.

HNB had \$467 thousand in unfunded commitments to organizations within the AA. We considered HNB's unfunded commitments as performance context information for the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Parkersburg AA was not inconsistent with the bank's overall performance under the Investment Test in the State of West Virginia. In the Huntington and Morgantown AAs, the bank's performance was stronger than the bank's overall performance under the Investment Test in the State of West Virginia. In the combined non-metropolitan AA, the bank's performance was weaker than the bank's overall performance under the Investment Test in the state. Performance in these AAs did not have a significant impact on the overall conclusion for West Virginia. Refer to Table 14 in the State of West Virginia section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Review

HNB's performance under the Service Test in West Virginia is rated Outstanding. Based on the full-scope review, the bank's performance in the Charleston AA was excellent.

Retail Banking Services

HNB's systems for delivering retail banking services in the State of West Virginia were readily accessible to geographies and individuals of different income levels. The bank had excellent accessibility of its service delivery systems in the Charleston AA. Refer to Table 15 in the State of West Virginia section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

HNB had eight full-service branches in the AA. The bank had two branches in low-income geography and one branch in a moderate-income geography. The percentage of the bank's branches in low- and moderate-income geographies exceeded the percentage of the population residing in those geographies within the AA. HNB had not opened or closed any branches in this AA during the evaluation period.

The bank's hours and services offered throughout the assessment area were good. There were only minor differences in the bank's services and business hours throughout the AA, none of which adversely affect low- or moderate-income geographies or individuals. In addition to offering Monday through Friday banking hours, many branches offered Saturday banking hours. Branch personnel were also available for appointments outside the standard service hours. Management periodically reviewed business hours to ensure they met the needs of the local community.

Alternative Delivery Systems

The bank's ATM network offered an effective alternative system for delivering retail banking services to low- and moderate-income individuals and geographies. In addition to ATMs at the majority of its offices, HNB offered ATMs in convenience and grocery stores in the AA. HNB operated 33 ATMs in the Charleston AA. The percentage of ATMs located in low-income geographies (6.06 percent) and in moderate-income geographies (24.24 percent) exceeded the percentage of the population in those geographies.

HNB offered other alternative delivery systems, including banking by telephone and internet banking. Telephone banking services were available 24 hours a day via a toll-free telephone number. This service allowed customers to open accounts, apply for loans, and access deposit and loan information. Telephone banking services were offered in English and Spanish. Internet banking services were also available 24 hours a day. This service allowed customers to access account balances, download account transaction information, transfer funds, apply for loans and new accounts, and pay bills. No information was available on the effectiveness of these services in reaching low- and moderate-income individuals or geographies. We did not place significant weight on these systems when drawing conclusions under the Service Test.

Community Development Services

HNB's performance in providing Community Development (CD) services in the Charleston AA was good and had a positive impact on the Service Test rating. Bank management and employees provided a good level of CD services targeted to low- and moderate-income individuals and geographies within HNB's AA. Numerous hours of CD services were provided to 20 organizations during the evaluation period. These services mainly included providing technical expertise to nonprofit or government organizations.

The following are examples of CD services performed in this AA during the evaluation period:

- Two employees were board members of the Center for Economic Options. This independent non-governmental organization developed and implemented strategies that support sustainable, locally-owned and operated small businesses. The organization primarily serves rural small-scale manufacturers, specialty farmers, and artisans.
- An employee was a board member of the Religious Coalition for Community Renewal. This organization develops programs that identify, address, and overcome the obstacles that keep people from decent, affordable housing.
- An employee was on the fund raising committee of West Virginia Health Right. This organization provided free medical services and prescription drugs to uninsured low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Morgantown, Parkersburg AA and the combined non-metropolitan AA was not inconsistent with the bank's overall Outstanding rating under the Service Test in West Virginia. The bank's performance under the Service Test in the Huntington AA was weaker than the bank's overall performance under the Service Test in West Virginia. The bank's performance in this AA was weaker than its overall performance because the branch and ATM network in this AA was not as accessible to low- and moderate-income individuals as in the Charleston AA. This did not negatively impact the overall rating because only 9.16 percent of the bank's deposits were from this AA. Refer to Table 15 in Appendix D for the facts and data that support these conclusions

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): (01/01/03 to 12/31/06) Investment Test: (01/01/03 to 12/31/06) Service Tests Test: (01/01/03 to 12/31/06) CD Loans: (01/01/03 to 12/31/06)	
Financial Institution		Products Reviewed
The Huntington National Bank (HNB) Columbus, OH		Mortgage loans, small loans to businesses and farms, CD loans, CD investments, CD services and branch services
Affiliate(s)	Affiliate Relationship	Products Reviewed
Huntington Community Development Corporation (HCDC)	Subsidiary of Huntington Bancshares Incorporated	Community Development Investments
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Cincinnati MMA	Full-Scope	Within the Cincinnati-Middletown, OH-KY-IN Metropolitan Statistical Area #1740, includes only Boone, Kenton, and Campbell Counties in Kentucky and Hamilton, Butler, Warren, and portions of Clermont Counties in Ohio
Florida Naples AA Fort Pierce AA	Full-Scope Limited-Scope	Includes the entire Naples MSA #34940 Includes only Martin County within the Port St. Lucie-Fort Pierce MSA #38940
Indiana Indianapolis AA Anderson AA	Full-Scope Limited-Scope	Includes only Marion, Hendricks, Hamilton, and portions of Johnson Counties within the Indianapolis-Carmel MSA #26900 Includes the entire Anderson MSA #11300

Lafayette AA	Limited-Scope	Includes only Tippecanoe County within the Lafayette MSA #29140
Michigan		
Detroit-Warren AA	Full-Scope	Includes only Oakland and Macomb Counties within the Warren-Troy-Farmington Hills Metropolitan Division #47644
Benton Harbor AA	Limited-Scope	Includes only portions of Berrien County within the Benton Harbor MSA #35660
Detroit-Wayne AA	Limited-Scope	Includes the entire Detroit-Livonia-Dearborn Metropolitan Division #19804
Dowagiac AA	Limited-Scope	Includes only Cass County within the South Bend-Mishawaka, IN-MI MSA #43780
Grand Rapids AA	Limited-Scope	Includes the entire Grand Rapids-Wyoming, MSA #24340 except Barry County
Holland-Grand Haven AA	Limited-Scope	Includes the entire Holland-Grand Haven MSA #26100
Kalamazoo AA	Limited-Scope	Includes the entire Kalamazoo-Portage MSA #28020 except Van Buren County
Muskegon AA	Limited-Scope	Includes the entire Muskegon-Norton Shores MSA #34740
Non-MSA AA	Limited-Scope	Includes Allegan, Antrim, Charlevoix, Chippewa, Crawford, Emmet, Grand Traverse, Kalkaska, Leelanau, Manistee, Mecosta, Montcalm, Oceana, and Osceola Counties and also portions of Mackinac County
Ohio		
Columbus AA	Full-Scope	Includes the entire Columbus MSA #18140 except Morrow and Pickaway Counties
Akron AA	Limited-Scope	Includes Portage County and portions of Summit County within the Akron MSA #10420
Canton AA	Limited-Scope	Includes the entire Canton-Massillon MSA #15940 except Carroll County
Cleveland AA	Limited-Scope	Includes the entire Cleveland-Elyria-Mentor MSA #17460 except Medina County and portions of Lorain County
Dayton AA	Limited-Scope	Includes the entire Dayton MSA #19380 except Preble County and portions of Miami and Greene Counties
Green AA	Limited-Scope	Includes portions of Summit County from

Lima AA	Limited-Scope	the Akron MSA #10420 Includes the entire Lima MSA #30620
Mansfield AA	Limited-Scope	Includes the entire Mansfield MSA #31900
Springfield AA	Limited-Scope	Includes the entire Springfield MSA #44220
Toledo AA	Limited-Scope	Includes the entire Toledo MSA #45780 except Fulton County and portions of Ottawa County
Wadsworth/Medina AA	Limited-Scope	Includes portions of Medina County from within the Cleveland-Elyria-Mentor MSA #17460
Non-MSA AA	Limited-Scope	Includes Ashland, Fayette, Logan, Muskingum, Ross, Sandusky, and Tuscarawas Counties
West Virginia		
Charleston AA	Full-Scope	Includes only Kanawha and Putnam Counties from with the Charleston MSA #16620
Huntington AA	Limited-Scope	Includes only Cabell and Wayne Counties from with the Huntington-Ashland, WV-KY-OH MSA #26580
Morgantown AA	Limited-Scope	Entire Morgantown MSA #34060 except Preston County
Parkersburg AA	Limited-Scope	Includes only Wood County, West Virginia from within the Parkersburg-Marietta-Vienna, WV-OH MSA #37620
Non-MSA AA	Limited-Scope	Harrison, Lewis, Marion, Randolph, Ritchie, and Wetzel Counties

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS: The Huntington National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
The Huntington National Bank	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Cincinnati – Middletown MMA	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
Florida	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Indiana	Outstanding	Outstanding	High Satisfactory	Outstanding
Michigan	Outstanding	Low Satisfactory	Outstanding	Outstanding
Ohio	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
West Virginia	High Satisfactory	Low Satisfactory	Outstanding	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

Cincinnati – Middletown Multistate Metropolitan Area

Demographic Information for Full-Scope Area: HNB Cincinnati AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	432	11.57	21.76	43.98	21.76	0.93
Population by Geography	1,749,557	7.15	17.60	46.76	28.39	0.10
Owner-Occupied Housing by Geography	450,076	2.51	14.07	50.53	32.89	0.00
Business by Geography	107,205	6.06	17.37	46.66	28.96	0.95
Farms by Geography	2,496	1.64	10.42	57.17	30.77	0.00
Family Distribution by Income Level	455,821	18.71	18.07	22.83	40.39	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	167,649	12.24	26.07	46.91	14.79	0.00
Median Family Income HUD Adjusted Median Family Income for 2006 Households Below Poverty Level		54,771 64,600 10%	Median Housing Value = 119,108 Unemployment Rate = 4.8%			

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

Source: 2000 US Census and 2006 HUD updated MFI

HNB's Cincinnati assessment area ("AA") consisted of all, or a part of, seven of the fifteen counties in the Cincinnati-Middletown Multistate Metropolitan Area ("Cincinnati MMA"). The AA includes Boone, Kenton, and Campbell Counties in Kentucky as well as Hamilton, Butler, and Warren Counties in Ohio. Fourteen census tracts in Clermont County, Ohio were also included in the AA. The census tracts from Clermont County were included in the Cincinnati MMA to reflect the inclusion of whole cities within Clermont County and the inclusion of the areas of the county that the bank could reasonably be expected to serve. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

HNB had 34 branches within the AA, representing 7.41 percent of the bank's total branch network. Seven new branches were opened in AA during the evaluation period, and one was closed. As of June 30, 2003, the bank ranked fifth within the AA in total deposits with a 3.97 percent market share. HNB's deposits totaled \$1.5 billion. Deposit competitors included Fifth Third, U.S. Bank, National City, and PNC. Based on deposits, Cincinnati MMA was the bank's fourth largest rating area and accounted for approximately 6.32 percent of total bank deposits.

The AA was part of the second fastest growing metropolitan area within Ohio. Economic growth has occurred primarily in the suburban areas surrounding Cincinnati. Economic conditions within the City of Cincinnati are weak. Cincinnati continues to experience a decline in population and jobs. The manufacturing sector continues to be stagnant. During the course of the evaluation period, the unemployment rate in the Cincinnati MMA dropped from 5.8 percent in January 2003 to 4.8 percent in December 2006.

The city has several wealthy neighborhoods, but also has areas with significant economic and social needs. Selected geographies in Cincinnati have been designated as an Empowerment

Zone and an Enterprise Zone to stimulate the local economy and create and retain jobs. The city has established programs offering tax increment financing to encourage economic development.

The AA has a diverse economy with major employers in the retail trade, government, financial services, health care, transportation, and manufacturing. Cincinnati is the headquarters for several FORTUNE 500 companies, including Procter and Gamble, Kroger, and Federated Department Stores. Other major employers include the University of Cincinnati, Health Alliance of Greater Cincinnati, and Children's Hospital Medical Group.

Community contacts made during the evaluation period indicated that significant needs for the Cincinnati AA included financial literacy programs and loans for the construction, rehabilitation, and acquisition of affordable housing. Credit needs also exist for small business lending, including micro-loans, and technical assistance. The community contacts indicated that the Cincinnati AA had numerous community development opportunities. Opportunities included the promotion of financial literacy, the construction and rehabilitation of affordable housing, and the creation and retention of businesses.

State of Florida

Naples AA

Demographic Information for Full-Scope Area: HNB Naples AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	52	7.69	17.31	44.23	30.77	0.00
Population by Geography	251,377	7.48	18.77	45.24	28.51	0.00
Owner-Occupied Housing by Geography	77,829	2.30	13.08	47.98	36.65	0.00
Business by Geography	36,597	1.73	11.07	44.30	42.90	0.00
Farms by Geography	990	4.85	21.92	50.71	22.53	0.00
Family Distribution by Income Level	71,823	19.06	19.32	20.65	40.97	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	27,566	11.06	23.57	46.02	19.35	0.00
Median Family Income		54,531	Median Housing Value = 191,305 Unemployment Rate = 2.5%			
HUD Adjusted Median Family Income for 2006		66,100				
Households Below Poverty Level		8%				

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

Source: 2000 US Census and 2006 HUD updated MFI

HNB's Naples AA consisted of the entire Naples MSA, which covers Collier County, Florida. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low-and/or moderate-income geographies. As of the end of the evaluation period, HNB had two branches located within the Naples AA.

As of June 30, 2006, one hundred percent of HNB's deposits within the state were derived from offices in this AA. According to the FDIC's deposit market share data, HNB had the 27th largest share of the deposit market in the Naples AA. Its market share was 0.42 percent. Based upon the market share data, HNB's most significant competitors included Fifth Third, Bank of America, and Wachovia.

Collier County is the largest county in the State of Florida by land area. The population of Collier County is centered in the cities of Naples, Marco Island, and Immokalee. Naples is the business center and the focus of population growth. Marco Island is a resort community. Agricultural operations are located in the northeast section of the county, principally in the Immokalee area. The remainder of Collier County to the south and east is mostly in public ownership as conservation lands. Nearly 80 percent of the land in Collier County is set aside as preserve lands, including national parks, wildlife refuges, a research reserve, and state parks.

Collier County's economy continues to be heavily weighted in the production of goods and services for new residents and temporary visitors. The retail trade, construction, and hotel industries employ over 62,000 people in Collier County. The healthcare industry follows with over 13,000 employed. The economy of Naples is largely based upon tourism. Employment and sales figures increase sharply with seasonal increases in tourists and part-time residents. The seasonality has, however, become less prominent in recent years as more part-time

residents are making Collier County their full-time home. The top employers in the Naples AA are Naples Community Hospital, Publix Supermarkets, Wal-Mart, Ritz Carlton, Marriott, and state and local government. Overall, the Naples economy has been expanding at a moderate pace.

During the course of the evaluation period, the unemployment rate in the Naples MSA decreased from 4.9 percent in January 2003 to 2.5 percent in December 2006. Within the AA, the annual unemployment rate was 4.9 percent in 2003, and it dropped to 3.0 percent in 2006. In comparison, the 2003 annual unemployment rate for Florida was 5.3 percent, and the annual national unemployment rate in 2003 was 6.0 percent. The 2006 annual unemployment rate for Florida was 3.0 percent and the annual national unemployment rate in 2006 was 4.6 percent.

Collier County formed a community development association and designated two areas of the county as redevelopment areas, the Bayshore/Gateway Triangle and Immokalee. The county development association was involved in public and private projects, and it offered grants and other subsidies to encourage development in those areas. Community contacts made during the evaluation period indicated that significant needs for the Naples AA included affordable housing; construction financing; financial literacy programs; and community services targeted to low- or moderate-income persons, including employment training. The community contacts indicated that adequate opportunities were available for community development and other credit-related projects.

State of Indiana

Indianapolis AA

Demographic Information for Full-Scope Area: HNB Indianapolis AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	254	10.24	31.10	37.40	20.87	0.39
Population by Geography	1,194,005	5.91	26.24	39.99	27.85	0.00
Owner-Occupied Housing by Geography	306,075	3.72	21.18	42.09	33.00	0.00
Business by Geography	84,518	4.39	18.85	44.26	32.36	0.14
Farms by Geography	1,809	2.10	12.16	52.63	33.11	0.00
Family Distribution by Income Level	308,025	19.81	18.49	22.48	39.21	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	117,992	10.47	40.25	36.53	12.76	0.00
Median Family Income HUD Adjusted Median Family Income for 2006 Households Below Poverty Level		55,425 65,100 9%	Median Housing Value = 110,990 Unemployment Rate = 4.1%			

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

Source: 2000 US Census and 2006 HUD updated MFI

Out of the ten counties in the Indianapolis-Carmel IN MSA, the Indianapolis AA consisted of Marion, Hendricks, and Hamilton Counties and also of seven census tracts within Johnson County. Although HNB had no branches located in Johnson County, the bank had a branch located across the street from the county line dividing Marion and Johnson Counties. The seven census tracts that were included in the AA were intended to reflect that portion of Johnson County that the bank could reasonably be expected to serve from the branch within Marion County. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

HNB had 19 branches located within the Indianapolis AA. As of June 30, 2006, 77.26 percent of HNB's deposits within the state were derived from offices in this AA. According to the FDIC's deposit market share data, HNB had the 9th largest share of the deposit market in the Indianapolis AA. Its market share was 2.77 percent. Based upon the market share data, HNB's most significant competitors included JP Morgan Chase, Fifth Third, and National City.

Major industries in the Indianapolis AA include manufacturing, health care, social services, and retail trade. The AA's major employers include Ely Lilly, Indiana and Purdue Universities, Carlian Health Partners, Community Health Network, St. Vincent Hospital, and FedEx. During the course of the evaluation period, the unemployment rate in the Indianapolis MSA decreased from 4.9 percent in January 2003 to 4.1 percent in December 2006. Within the AA, the annual unemployment rate was 4.8 percent in 2003, and it decreased to 4.4 percent in 2006. In comparison, the 2003 unemployment rate for Indiana was 5.3 percent, and the annual national unemployment rate in 2003 was 6.0 percent. The 2006 unemployment rate for Indiana was 5.0 percent, and the annual national unemployment rate in 2006 was 4.6 percent.

Community contacts made during the evaluation period indicated that significant needs for the Indianapolis AA included affordable housing; affordable construction financing; down payment assistance, home ownership training, housing for senior citizens; financial literacy/foreclosure prevention programs; small business loans; and donations or affordable construction financing for community groups to aid them in their missions. The community contacts indicated that adequate opportunities were available for community development and other credit-related projects in the Indianapolis AA.

State of Michigan

Detroit–Warren AA

Demographic Information for Full-Scope Area: Detroit-Warren AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	543	2.21	19.89	49.91	27.62	0.37
Population by Geography	1,982,305	1.86	19.57	50.75	27.80	0.02
Owner-Occupied Housing by Geography	596,129	0.85	18.11	51.58	29.46	0.00
Business by Geography	153,546	2.30	17.48	49.86	30.17	0.19
Farms by Geography	3,431	1.46	16.12	58.35	24.07	0.00
Family Distribution by Income Level	528,770	18.03	18.20	23.57	40.21	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	191,549	3.41	29.96	52.13	14.50	0.00
Median Family Income HUD Adjusted Median Family Income for 2006 Households Below Poverty Level		67,923 79,500 6%	Median Housing Value = 167,345 Unemployment Rate = 7.2%			

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2006 HUD updated MFI

The HNB's Detroit-Warren AA consisted of Macomb and Oakland Counties, which are two of the five counties in the Detroit-Warren-Troy-Farmington Hills, MI Metropolitan Division. The largest cities in this AA include Warren, Sterling Heights, Farmington Hills, Troy, and Pontiac. The Detroit-Warren AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

HNB had 39 branches located within the Detroit-Warren AA. As of June 30, 2006, 43.87 percent of HNB's deposits within the state were derived from offices in this AA. According to the FDIC's deposit market share data, HNB had the eighth largest share of the deposit market in the Detroit-Warren AA. Its market share was 4.35 percent. Based upon the market share data, HNB's most significant competitors were LaSalle, Comerica, Flagstar, and JP Morgan Chase.

The Detroit-Warren AA borders Wayne County, the county in which the City of Detroit is located. Both counties in the Detroit-Warren AA experienced population growth during the evaluation period. In each of the years between 2003 and 2006, neighboring Wayne County lost more of its population than any other county in Michigan, while Macomb County gained more absolute numbers of people than any other county in Michigan. During each year of the same time period, Oakland County also was always in the top ten counties within Michigan for population gains.

The Detroit-Warren AA has an automotive-oriented economic base, referred to as "Automation Alley." Automation Alley is one of the largest employment centers for engineering and related occupations in the United States. Other major industries within the AA include healthcare/social services and professional/business services. Major employers include Ford, DaimlerChrysler, General Motors, William Beaumont Hospital, St. Joseph's Health Network,

and local governments. During the course of the evaluation period, the unemployment rate in the Detroit-Warren AA went from 7.6 percent in January 2003 to 7.2 percent in December 2006. Within the AA, the annual unemployment rate was 7.2 percent in 2003 and in 2006. In comparison, the 2003 annual unemployment rate for Michigan was 7.1 percent, and the annual national unemployment rate in 2003 was 6.0 percent. The 2006 annual unemployment rate for Michigan was 6.9 percent, and the annual national unemployment rate in 2006 was 4.6 percent. Michigan's unemployment rate was one of the highest in the country in December 2006. Michigan's unemployment rate has consistently been among the highest in the country, well above the national rate.

The Detroit-Warren AA experienced a sharp increase in the number of mortgage foreclosures. According to reports released by RealtyTrac, the number of foreclosure filings in Macomb County nearly tripled from 2,755 in 2005 to 8,192 in 2006, translating to one home for every 39 in the county. In Oakland County, the number jumped from 3,754 in 2005 to 7,282, equaling one for every 68 homes. In contrast, the foreclosure rate was higher in neighboring Wayne County, with the number of filings more than doubling, from 18,176 to 40,220, translating to one for every 21 homes in 2006. Overall, RealtyTrac reported that Michigan had one of the highest foreclosure rates in the country as of December 2006.

There are a variety of community groups addressing housing, economic and social issues within the AA. Some of the groups are focused on specific neighborhoods, and others are city wide, regional, or state organizations. Community contacts made during the evaluation period indicated that significant needs for the Detroit-Warren AA included affordable housing; financial literacy/foreclosure prevention programs; affordable home improvement loans; and community services targeted to low- or moderate-income persons, including employment training and child care. The community contacts indicated that the Detroit-Warren AA had a moderate number of community development lending, investment, and service opportunities.

State of Ohio

Columbus AA

Demographic Information for Full-Scope Area: Columbus AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	367	9.54	26.70	38.15	25.61	0.00
Population by Geography	1,528,339	6.83	22.87	40.85	29.45	0.00
Owner-Occupied Housing by Geography	378,540	3.04	17.70	44.28	34.98	0.00
Business by Geography	104,675	7.45	18.81	39.53	34.21	0.00
Farms by Geography	3,324	1.56	10.59	58.42	29.42	0.00
Family Distribution by Income Level	391,595	19.30	18.28	22.99	39.42	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	147,184	11.42	33.87	40.88	13.84	0.00
Median Family Income HUD Adjusted Median Family Income for 2006 Households Below Poverty Level		54,708 64,400 10%	Median Housing Value = 120,445 Unemployment Rate = 4.5%			

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

Source: 2000 US Census and 2006 HUD updated MFI

HNB's Columbus AA consists of six of the eight counties in the Columbus OH MSA. These counties are Delaware, Fairfield, Franklin, Licking, Madison, and Union Counties. The City of Columbus is located in Franklin County. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

HNB is headquartered in Columbus, Ohio. In addition to the headquarters location, HNB had 58 branches located within the Columbus AA. As of June 30, 2006, 54.65 percent of HNB's deposits within the state were derived from offices in this AA. According to the FDIC's deposit market share data, HNB had the largest share of the deposit market in the Columbus AA. Its market share was 28.14 percent. Based upon the market share data, HNB's most significant competitors include JP Morgan Chase, Fifth Third, and National City.

Columbus is Ohio's state capital, and the state is one of the largest employers within the Columbus OH MSA. In addition to government, other major industries in the area include business services, retail trade, financial services, and healthcare. During the course of the evaluation period, the unemployment rate in the Columbus MSA decreased from 5.9 percent in 2003 to 4.5 percent in December 2006. Within the AA, the annual unemployment rate was 5.4 percent in 2003, and it decreased to 4.7 percent in 2006. In comparison, the 2003 annual unemployment rate for Ohio was 6.2 percent, and the annual national unemployment rate in 2003 was 6.0 percent. The 2006 annual unemployment rate for Ohio was 5.5 percent, and the annual national unemployment rate in 2006 was 4.6 percent. As of the fourth quarter of 2006, the Federal Reserve Bank of Cleveland determined that Ohio had one of the highest real estate foreclosure rates of any state in the nation. Ohio's percentage of loans in foreclosure was almost three times as high as the national average.

The City of Columbus has identified several areas for redevelopment and has programs offering tax incentives and other subsidies to encourage the development of housing and businesses in those areas. There are a variety of community groups addressing housing, economic, and social issues within the AA. Some of the groups are focused on specific neighborhoods, and others are city wide, regional, or state organizations.

Community contacts made during the evaluation period indicated that significant needs for the Columbus AA included affordable housing; construction financing; flexible mortgage programs; financial literacy/foreclosure prevention programs; and community services targeted to low- or moderate-income persons, including employment training and child care. The community contacts indicated that the Columbus AA had numerous community development lending, investment, and service opportunities.

State of West Virginia

Charleston AA

Demographic Information for Full-Scope Area: Charleston AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	61	1.64	14.75	59.02	24.59	0.00
Population by Geography	251,662	0.57	8.69	63.45	27.30	0.00
Owner-Occupied Housing by Geography	77,433	0.12	7.43	64.46	27.98	0.00
Business by Geography	15,619	12.84	10.74	49.31	27.11	0.00
Farms by Geography	240	1.25	7.92	60.42	30.42	0.00
Family Distribution by Income Level	71,341	18.91	16.87	20.28	43.94	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	25,526	0.77	12.58	70.50	16.14	0.00
Median Family Income HUD Adjusted Median Family Income for 2006 Households Below Poverty Level		40,961 52,500 14%		Median Housing Value = 83,974 Unemployment Rate = 4.1%		

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

Source: 2000 US Census and 2006 HUD updated MFI

The Charleston AA consists of two of the five counties in the Charleston WV MSA. These counties are Kanawha and Putnam. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and/or moderate-income geographies.

HNB had 8 branches located within the Charleston AA. As of June 30, 2006, 27.41 percent of HNB's deposits within the state were derived from offices in this AA. According to the FDIC's deposit market share data, HNB had the 5th largest share of the deposit market in the Charleston AA. Its market share was 9.94 percent. Based upon the market share data, HNB's most significant competitors included Branch Banking & Trust Co., JP Morgan Chase, City National Bank of West Virginia, and United Bank.

The City of Charleston is located in Kanawha County. Charleston is West Virginia's state capital, and the state is one of the largest employers within the Charleston WV MSA. In addition to the government, other major employers include American Electric Power, Appalachian Power Company, Alberici Mid-Atlantic WV, Bayer Cropscience, Charleston Area Medical Center, Dow Corporation, Toyota, and the Herbert J. Thomas Memorial Hospital Association.

During the course of the evaluation period, the unemployment rate in the Charleston WV MSA dropped from 6.5 percent in January 2003 to 4.1 percent in December 2006. Within the AA, the annual unemployment rate was 5.6 percent in 2003, and it dropped to 4.5 percent in 2006. In comparison, the 2003 annual unemployment rate for West Virginia was 6.0 percent, and the annual national unemployment rate in 2003 was 6.0 percent. 2006 annual unemployment rate for West Virginia was 4.9 percent, and the annual national unemployment rate in 2006 was 4.6 percent.

The Charleston AA's economy is profoundly affected by its geography. For example, Kanawha County is the state's largest county. The county contains 911 square miles, only seven percent of which have a slope of less than 10 percent. Land with a slope in excess of ten to fifteen percent is generally considered too cost prohibitive to develop. As a result of the sloped topography, there is an incentive to develop the valley floors within the AA. However, nearby sloped land increases the development costs in the valley floors due to increased flooding in the valleys caused by the water running off of nearby sloped land. Many areas of the Charleston AA have been constructed in flood plains, and future development is subject to additional restrictions and requirements. In addition to its geography, the AA's economy is negatively impacted by the lack of a major airport or port facility and by a generally low population density.

Based upon discussions with HNB management and the community organizations that we contacted, we identified a limited number of opportunities to make investments within the Charleston AA. Eighty to ninety percent of all low-income housing tax credits were awarded to projects that were funded by state or regional funds, as opposed to being funded by direct investments. The direct investments that were available were offered by a limited number of developers. HNB's ability to invest in these projects was limited due to safety and soundness concerns and due to the nearly exclusive relationships that the developers have with other financial institutions.

Community contacts made during the evaluation period indicated that significant needs for the Charleston AA included quality affordable housing, flexible mortgage programs, and financial literacy/foreclosure prevention programs.

Appendix D: Tables of Performance Data

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: (1) 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; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. 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. [Note: Do not renumber the tables.]

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 in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column with the appropriate caption, such as: “Statewide/Regional,” “Statewide/Regional with potential benefit to one or more AAs” or “Out of Assessment Area.” “Out of Assessment Area” is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- 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 Home Mortgage 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 in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

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.

Tables of Performance Data

Cincinnati – Middletown Multistate Metropolitan Area

State of Florida
State of Indiana
State of Michigan
State of Ohio
State of West Virginia

Table 1. Lending Volume

LENDING VOLUME		Geography: Cincinnati MMA						Evaluation Period: January 1, 2003 TO December 31, 2006				
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:												
Cincinnati MMA	100.00	7,873	966,810	4,709	542,496	11	621	20	17,559	12,613	1,527,486	100.00%
Limited Review:												
State/Regional Loans	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2	3,183	2	3,183	

* Loan Data as of December 31, 2006. 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 December 31, 2006].

*** Deposit Data as of June 30, 2006. 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: Cincinnati MMA						Evaluation Period: January 1, 2003 TO December 31, 2006							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
Cincinnati MMA	2,927	100.00	2.51	2.70	14.07	11.89	50.53	45.85	32.89	39.56	1.06	1.25	0.95	1.00	1.17

* Based on 2005Peer Mortgage Data: Eastern Region.

** 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: Cincinnati MMA				Evaluation Period: January 1, 2003 TO December 31, 2006								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
Cincinnati MMA	719	100.00	2.51	1.95	14.07	12.66	50.53	52.85	32.89	32.55	2.85	1.03	2.19	2.87	3.32

* Based on 2005 Peer Mortgage Data: Eastern Region.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement 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 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: Cincinnati MMA				Evaluation Period: January 1, 2003 TO December 31, 2006								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
Cincinnati MMA	4,216	100.00	2.51	1.59	14.07	10.15	50.53	47.65	32.89	40.61	1.34	0.76	1.19	1.30	1.51

* Based on 2005 Peer Mortgage Data: Eastern Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance 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 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: Cincinnati MMA						Evaluation Period: January 1, 2003 TO December 31, 2006							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Cincinnati MMA	11	100.00	17.91	18.18	22.01	27.27	43.74	18.18	16.27	36.36	1.49	3.51	1.92	0.80	0.00

* Based on 2005 Peer Mortgage Data: Eastern Region.

** 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: Cincinnati MMA						Evaluation Period: January 1, 2003 TO December 31, 2006						
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:															
Cincinnati MMA	4,709	100.00	6.31	4.01	17.62	17.20	46.57	46.70	28.49	31.81	2.75	2.68	3.17	2.83	2.62

* Based on 2005 Peer Small Business Data: US.

** 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 2006.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: Cincinnati MMA				Evaluation Period: January 1, 2003 TO December 31, 2006									
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cincinnati MMA	11	100.0	1.63	0.0	10.23	0.0	57.60	45.45	30.49	54.55	1.22	0.0	0.0	1.18	1.72

* Based on 2005 Peer Small Business Data: US.

** 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 2006.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: Cincinnati MMA						Evaluation Period: January 1, 2003 TO December 31, 2006						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Cincinnati MMA	2,927	100.0	18.71	11.00	18.07	25.56	22.83	27.20	40.39	32.97	1.21	1.20	1.20	1.31	1.14

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by Bank.

*** 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: Cincinnati MMA				Evaluation Period: January 1, 2003 TO December 31, 2006									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families* **	% BANK Loans*** *	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Cincinnati MMA	719	100.0	18.71	14.33	18.07	25.31	22.83	27.26	40.39	33.10	2.87	3.07	3.22	2.96	2.50

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by Bank.

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: Cincinnati MMA						Evaluation Period: January 1, 2003 TO December 31, 2006						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Cincinnati MMA	4,216	100.0	18.71	9.32	18.07	19.90	22.83	26.42	40.39	40.30	1.60	1.46	1.36	1.59	1.81

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 4.4% of loans originated and purchased by Bank.

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: Cincinnati MMA Evaluation Period: January 1, 2003 TO December 31, 2006									
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:									
Cincinnati MMA	4,709	100.0	60.65	60.46	77.53	9.94	12.53	2.75	3.66

* Based on 2005 Peer Small Business Data: US.

** 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-Year).

**** 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 5.74% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Cincinnati MMA			Evaluation Period: January 1, 2003 TO December 31, 2007				
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:									
Cincinnati MMA	11	100.0	88.81	81.82	72.73	27.27	0	1.22	1.41

* Based on 2005 Peer Small Business Data: US.

** 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-Year).

**** 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 3.51% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Cincinnati MMA				Evaluation Period: January 1, 2003 TO December 31, 2006			
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:									
Cincinnati MMA	12	1,238	57	2,619	69	3,857	93.87	3	2,251
Limited Review:									
Broader Regional Investments with No Potential Benefit to the AA	1	252	0	0	1	252	6.13	1	149

* '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: Cincinnati MMA Evaluation Period: January 1, 2003 TO December 31, 2006																		
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:																		
Cincinnati MMA	100.00	35	100.00	0.00	14.29	57.14	28.57	6	1	0	0	+3	+2	7.19	17.70	46.46	28.55	

Table 1. Lending Volume

LENDING VOLUME		Geography: State of Florida						Evaluation Period: January 1, 2003 TO December 31, 2006				
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:												
Naples AA	89.31	380	130,755	111	12,622	0	0	2	3,138	493	146,515	100.00
Limited Review:												
Fort Pierce AA	10.69	29	7,110	30	3,944	0	0	0	0	59	11,054	0.00

* Loan Data as of December 31, 2006. 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 December 31, 2006.

*** Deposit Data as of June 30, 2006. 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: State of Florida				Evaluation Period: January 1, 2003 TO December 31, 2006								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
Naples AA	224	95.32	2.30	15.18	13.08	7.59	47.98	35.27	36.65	41.96	0.23	0.78	0.07	0.17	0.35
Limited Review:															
Fort Pierce AA	11	4.68	0.00	0.00	3.71	0.00	53.89	36.36	42.40	63.64	0.04	0.00	0.00	0.00	0.10

* Based on 2005 Peer Mortgage Data: Eastern Region.

** 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: State of Florida				Evaluation Period: January 1, 2003 TO December 31, 2006								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
Naples AA	1	100.0	2.30	0.00	13.08	0.00	47.98	0.00	36.65	100.0	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Fort Pierce AA	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2005 Peer Mortgage Data: Eastern Region.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement 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 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: State of Florida					Evaluation Period: January 1, 2003 TO December 31, 2006				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% 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:																					
Naples AA	155	91.18	2.30	0.65	13.08	6.45	47.99	32.90	36.65	60.00	0.18	0.00	0.05	0.14	0.30						
Limited Review:																					
Fort Pierce AA	15	8.82	0.00	0.00	3.71	0.00	53.89	66.67	42.40	33.33	0.05	0.00	0.00	0.09	0.00						

* Based on 2005 Peer Mortgage Data: Eastern Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance 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 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: State of Florida						Evaluation Period: January 1, 2003 TO December 31, 2006							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Naples AA	0	0.00	2.08	0.00	7.03	0.00	35.11	0.00	55.78	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Fort Pierce AA	0	0.00	0.00	0.00	11.04	0.00	53.03	0.00	35.92	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2005 Peer Mortgage Data: Eastern Region.

** 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: State of Florida						Evaluation Period: January 1, 2003 TO December 31, 2006							
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:															
Naples AA	111	79.86	1.73	4.50	11.07	4.50	44.30	33.33	42.90	57.66	0.18	0.65	0.17	0.15	0.22
Limited Review:															
Fort Pierce AA	28	20.14	0.00	0.00	20.27	42.86	45.63	39.29	34.10	17.86	0.11	0.00	0.40	0.08	0.00

* Based on 2005 Peer Small Business Data: US.

** 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 2006.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: State of Florida															Evaluation Period: January 1, 2003 TO December 31, 2006														
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*																																	
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp																											
Full Review:																																												
Naples AA	0	0.00	4.85	0.00	21.92	0.00	50.71	0.00	22.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00																												
Limited Review:																																												
Fort Pierce AA	0	0.00	0.00	0.00	12.92	0.00	50.83	0.00	36.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00																												

* Based on 2005 Peer Small Business Data: US.

** 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 2006.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: State of Florida						Evaluation Period: January 1, 2003 TO December 31, 2006							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families**	% BANK Loans**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Naples AA	224	95.32	19.06	9.72	19.32	12.96	20.65	11.11	40.97	66.20	0.26	0.51	0.65	0.27	0.22
Limited Review:															
Fort Pierce AA	11	4.68	13.80	0.00	16.28	0.00	19.58	27.27	50.35	72.73	0.05	0.00	0.00	0.00	0.06

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by Bank.

*** 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: State of Florida						Evaluation Period: January 1, 2003 TO December 31, 2006							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families* **	% BANK Loans*** *	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Naples AA	1	100.0	19.06	0.00	19.32	0.00	20.65	0.00	40.97	100.0	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Fort Pierce AA	0	0.00	13.80	0.00	16.28	0.00	19.58	0.00	50.35	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by Bank.

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: State of Florida		Evaluation Period: January 1, 2003 TO December 31, 2006	
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*							
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp	
Full Review:																		
Naples AA	155	91.18	19.06	1.37	19.32	15.07	20.65	13.70	40.97	69.86	0.19	0.27	0.26	0.10	0.21			
Limited Review:																		
Fort Pierce AA	15	8.82	13.80	7.69	16.28	0.00	19.58	0.00	50.35	92.31	0.05	0.00	0.00	0.00	0.09			

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 4.4% of loans originated and purchased by Bank.

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: State of Florida		Evaluation Period: January 1, 2003 TO December 31, 2006		
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:									
Naples AA	111	79.86	64.84	65.77	65.77	18.02	16.22	0.18	0.33
Limited Review:									
Fort Pierce AA	28	20.14	65.78	64.21	83.50	7.46	9.04	4.20	5.97

* Based on 2005 Peer Small Business Data: US.

** 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- Year).

**** 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 5.74% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: State of Florida		Evaluation Period: January 1, 2003 TO December 31, 2006		
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:									
Naples AA	0	0.00	88.18	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Fort Pierce AA	0	0.00	92.71	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2005 Peer Small Business Data: US.

** 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-Year).

**** 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 3.51% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: State of Florida				Evaluation Period: January 1, 2003 TO December 31, 2006			
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:									
Naples AA	0	0	7	311	7	311	49.92	1	7
Limited Review:									
Fort Pierce AA	0	0	0	0	0	0	0	0	0
Statewide/Regional with Potential Benefit to One or More AAs	2	309	2	3	4	312	50.08	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: State of Florida				Evaluation Period: January 1, 2003 TO December 31, 2006			
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:																							
Naples AA	100.00	2	100.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	7.48	18.77	45.24	28.51						
Limited Review:																							
Fort Pierce AA	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0										

Table 1. Lending Volume

LENDING VOLUME		Geography: State of Indiana						Evaluation Period: January 1, 2003 TO December 31, 2006				
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:												
Indianapolis AA	72.07	3,638	441,609	2,497	233,481	0	0	19	46734	6,154	721,824	77.26
Limited Review:												
Anderson AA	4.05	264	20,503	82	2,696	0	0	0	0	346	23,199	5.21
Lafayette AA	23.88	1,813	219,307	226	15,928	1	50	0	0	2,039	235,285	17.53

* Loan Data as of December 31, 2006. 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 December 31, 2006.

*** Deposit Data as of June 30, 2006. 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: State of Indiana				Evaluation Period: January 1, 2003 TO December 31, 2006									
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
Indianapolis AA	1,745	64.99	3.72	4.99	21.18	14.56	42.09	39.37	33.00	41.09	0.88	1.82	0.87	0.80	0.89
Limited Review:															
Anderson AA	83	3.09	2.46	1.20	13.30	19.28	52.79	45.78	31.45	33.73	0.64	0.00	1.74	0.55	0.52
Lafayette AA	857	31.92	0.25	0.70	9.47	6.53	54.56	45.97	35.72	46.79	4.21	5.88	2.75	3.76	4.77

* Based on 2005Peer Mortgage Data: Eastern Region.

** 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: State of Indiana				Evaluation Period: January 1, 2003 TO December 31, 2006									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
Indianapolis AA	161	75.23	3.72	5.59	21.18	20.50	42.09	46.58	33.00	27.33	0.82	0.00	0.86	0.91	0.80
Limited Review:															
Anderson AA	15	7.01	2.46	0.00	13.30	26.67	52.79	60.00	31.45	13.33	1.01	0.00	5.88	0.00	0.79
Lafayette AA	38	17.76	0.25	0.00	9.47	2.63	54.56	65.79	35.72	31.58	4.26	0.00	0.00	4.72	4.48

* Based on 2005 Peer Mortgage Data: Eastern Region.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement 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 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: State of Indiana					Evaluation Period: January 1, 2003 TO December 31, 2006				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% 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:																					
Indianapolis AA	1,732	61.53	3.72	1.73	21.18	10.85	42.09	46.36	33.00	41.05	0.78	0.69	0.58	0.96	0.69						
Limited Review:																					
Anderson AA	166	5.90	2.46	0.00	13.30	18.07	52.79	58.43	31.45	23.49	0.67	0.00	1.02	0.87	0.25						
Lafayette AA	917	32.57	0.25	1.64	9.47	6.00	54.56	50.16	35.72	42.20	4.06	10.0	2.73	4.24	3.99						

* Based on 2005 Peer Mortgage Data: Eastern Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance 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 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: State of Indiana						Evaluation Period: January 1, 2003 TO December 31, 2006							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis AA	0	0.00	7.18	0.00	32.77	0.00	45.75	0.00	14.30	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Anderson AA	0	0.00	1.95	0.00	13.44	0.00	76.21	0.00	8.40	0.00	0.00	0.00	0.00	0.00	0.00
Lafayette AA	1	100.0	28.12	100.0	23.97	0.00	20.11	0.00	27.79	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2005 Peer Mortgage Data: Eastern Region.

** 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: State of Indiana					Evaluation Period: January 1, 2003 TO December 31, 2006				
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:																								
Indianapolis AA	2,497	89.02	4.39	4.12	18.85	15.42	44.26	43.01	32.36	37.44	2.10	4.63	2.09	1.98	2.19									
Limited Review:																								
Anderson AA	82	2.92	2.33	0.00	18.14	8.54	54.75	81.71	24.78	9.76	0.98	0.00	0.87	1.70	0.00									
Lafayette AA	226	8.06	5.79	0.88	31.18	27.88	37.18	42.48	25.60	28.76	2.13	1.90	1.96	2.04	2.71									

* Based on 2005 Peer Small Business Data: US.

** 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 2006.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: State of Indiana Evaluation Period: January 1, 2003 TO December 31, 2006				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Indianapolis AA	0	0.00	2.10	0.00	12.16	0.00	52.63	0.00	33.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:																
Anderson AA	0	0.00	0.22	0.00	4.01	0.00	52.12	0.00	43.65	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lafayette AA	1	100.0	0.00	0.00	6.15	0.00	62.87	0.00	30.98	100.0	1.37	0.00	0.00	0.00	0.00	5.88

* Based on 2005 Peer Small Business Data: US.

** 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 2006.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: State of Indiana						Evaluation Period: January 1, 2003 TO December 31, 2006						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis AA	1,745	64.99	19.81	15.14	18.49	27.62	22.48	24.97	39.21	32.27	1.00	1.60	0.93	0.90	0.94
Limited Review:															
Anderson AA	83	3.09	18.05	24.69	19.37	27.16	23.21	20.99	39.38	27.16	0.74	1.05	0.77	0.44	0.87
Lafayette AA	857	31.92	18.42	10.15	18.69	19.72	23.75	26.09	39.15	44.04	4.80	4.23	5.13	3.62	5.94

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by Bank.

*** 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: State of Indiana						Evaluation Period: January 1, 2003 TO December 31, 2006							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis AA	161	75.23	19.81	22.64	18.49	24.53	22.48	23.27	39.21	29.56	0.85	0.96	1.09	0.83	0.70
Limited Review:															
Anderson AA	15	7.01	18.05	13.33	19.37	20.00	23.21	26.67	39.38	40.00	1.04	0.00	1.05	0.86	1.53
Lafayette AA	38	17.76	18.42	23.68	18.69	18.42	23.75	47.37	39.15	10.53	4.44	14.3	0.00	5.77	1.64

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by Bank.

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: State of Indiana								Evaluation Period: January 1, 2003 TO December 31, 2006					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families* **	% BANK Loans*** *	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Indianapolis AA	1,732	61.53	19.81	10.27	18.49	22.10	22.48	29.01	39.21	38.62	0.98	1.20	0.77	1.12	0.94
Limited Review:															
Anderson AA	166	5.90	18.05	9.88	19.37	19.14	23.21	34.57	39.38	36.42	0.79	0.29	0.66	0.96	0.93
Lafayette AA	917	32.57	18.42	8.82	18.69	15.05	23.75	27.71	39.15	48.42	4.95	4.33	3.01	4.70	6.37

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 4.4% of loans originated and purchased by Bank.

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: State of Indiana			Evaluation Period: January 1, 2003 TO December 31, 2006		
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:										
Indianapolis AA	2,497	89.02	62.30	61.27	84.30	6.65	9.05	2.10	3.08	
Limited Review:										
Anderson AA	82	2.92	65.96	87.80	100.0	0.00	0.00	0.98	1.77	
Lafayette AA	226	8.06	64.48	78.32	85.84	9.29	4.87	2.13	3.95	

* Based on 2005 Peer Small Business Data: US.

** 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- Year).

**** 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 5.74% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: State of Indiana		Evaluation Period: January 1, 2003 TO December 31, 2006		
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:									
Indianapolis AA	0	0.00	91.49	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Anderson AA	0	0.00	97.33	0.00	0.00	0.00	0.00	0.00	0.00
Lafayette AA	1	100.0	94.08	100.0	100.00	0.00	0.00	1.37	1.75

* Based on 2005 Peer Small Business Data: US.

** 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-Year).

**** 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 3.51% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: State of Indiana				Evaluation Period: January 1, 2003 TO December 31, 2006			
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:									
Indianapolis AA	2	747	41	2,280	43	3,027	65.03	5	574
Limited Review:									
Anderson AA	0	0	2	154	2	154	3.31	2	3
Lafayette AA	0	0	5	730	5	730	15.68	1	15
Statewide/Regional with Potential Benefit to One or More AAs	1	437	0	0	1	437	9.39	0	0
Broader Regional Investments with No Potential Benefit to the AA	0	0	1	307	1	307	6.60	1	21

* '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: State of Indiana Evaluation Period: January 1, 2003 TO December 31, 2006																	
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:																	
Indianapolis AA	77.26	19	76.00	5.26	15.79	42.11	36.84	2	0	0	0	+1	+1	5.91	26.42	39.99	27.85
Limited Review:																	
Anderson AA	5.21	2	8.00	0.00	50.00	50.00	0.00	0	0	0	0	0	0	2.80	16.93	52.62	27.64
Lafayette AA	17.53	4	16.00	0.00	25.00	50.00	25.00	0	0	0	0	0	0	11.66	13.40	41.47	28.61

Table 1. Lending Volume

LENDING VOLUME												
Geography: State of Michigan												
Evaluation Period: January 1, 2003 TO December 31, 2006												
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:												
Detroit – Warren AA	24.64	4,536	647740	5292	481357	4	200	12	65626	9844	1194923	43.87
Limited Review:												
Benton Harbor AA	0.88	120	8,683	229	15,169	0	0	1	160	350	24,012	0.76
Detroit – Wayne AA	5.20	1,060	125,150	1,011	85,840	0	0	7	4,235	2,078	215,225	1.74
Dowagiac AA	1.14	222	17,488	227	10,049	4	92	1	15	454	27,644	0.73
Grand Rapids AA	17.97	3,864	481,000	3,230	310,222	65	2,737	21	7,509	7,180	368,568	23.65
Holland-Grand Haven AA	11.00	2,913	360,414	1,454	138,310	15	1,687	12	11,393	4,394	511,804	8.34
Kalamazoo AA	2.35	667	82,278	269	24,890	0	0	2	2,145	938	109,313	1.16
Muskegon AA	6.12	1,789	149,603	637	32,506	8	960	10	2,203	2,444	185,272	3.05
Non-MSA AA	30.70	8,715	1,083,300	3,452	246,259	62	1,745	31	13,059	12,265	1,345,154	16.70
State/Regional Loans	0	0	0	0	0	0	0	5	792	5	792	

* Loan Data as of December 31, 2006. 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 December 31, 2006.

*** Deposit Data as of June 30, 2006]. 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: State of Michigan						Evaluation Period: January 1, 2003 TO December 31, 2006							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
Detroit – Warren AA	1,246	16.54	0.85	1.28	18.11	16.29	51.58	53.21	29.46	29.21	0.45	0.59	0.36	0.46	0.50
Limited Review:															
Benton Harbor AA	14	0.19	0.00	0.00	9.50	14.29	84.52	78.57	5.98	7.14	0.36	0.00	0.79	0.33	0.00
Detroit – Wayne AA	412	5.47	3.81	1.94	22.11	15.29	38.26	32.77	35.82	50.00	0.16	0.05	0.12	0.09	0.29
Dowagiac AA	49	0.65	0.00	0.00	14.63	30.61	85.37	69.39	0.00	0.00	0.98	0.00	2.25	0.71	0.00
Grand Rapids AA	1,311	17.41	1.00	0.53	15.20	9.99	58.53	49.96	25.28	39.51	1.50	0.80	0.78	1.34	2.32
Holland-Grand Haven AA	1,011	13.42	0.00	0.00	4.67	6.43	91.47	88.82	3.87	4.75	3.61	0.00	5.09	3.42	6.47
Kalamazoo AA	412	5.47	2.27	1.21	11.27	6.80	50.65	32.28	35.81	59.71	1.97	0.83	0.40	1.10	3.87
Muskegon AA	539	7.16	3.33	4.27	15.03	20.78	54.98	50.09	26.66	24.86	2.97	6.25	4.35	2.39	2.99
Non-MSA AA	2,537	33.69	0.00	0.00	6.27	5.08	75.04	69.26	18.69	25.66	5.05	0.00	5.02	4.68	6.30

* Based on 2005 Peer Mortgage Data: Eastern Region.

** 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: State of Michigan				Evaluation Period: January 1, 2003 TO December 31, 2006									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
Detroit – Warren AA	405	23.20	0.85	0.74	18.11	23.95	51.58	50.86	29.46	24.44	1.53	0.87	1.74	1.42	1.67
Limited Review:															
Benton Harbor AA	15	0.86	0.00	0.00	9.50	46.67	84.52	53.33	5.98	0.00	2.58	0.00	15.38	1.53	0.00
Detroit – Wayne AA	80	4.58	3.81	5.00	22.11	57.50	38.26	22.50	35.82	15.00	0.24	0.53	0.52	0.16	0.14
Dowagiac AA	30	1.72	0.00	0.00	14.63	33.33	85.37	66.67	0.00	0.00	3.61	0.00	8.57	2.52	0.00
Grand Rapids AA	236	13.52	1.00	1.69	15.20	19.49	58.53	56.78	25.28	22.03	1.76	2.86	1.28	1.70	2.19
Holland-Grand Haven AA	144	8.25	0.00	0.00	4.67	4.17	91.47	91.67	3.87	4.17	3.15	0.00	2.50	3.02	9.09
Kalamazoo AA	29	1.66	2.27	13.79	11.27	20.69	50.65	44.83	35.81	20.69	0.92	0.00	2.08	1.08	0.37
Muskegon AA	136	7.79	3.33	5.88	15.03	25.00	54.98	49.26	26.66	19.85	4.16	0.00	5.77	4.14	3.82
Non-MSA AA	671	38.42	0.00	0.00	6.27	5.81	75.04	76.30	18.69	17.88	8.72	0.00	5.06	9.24	8.09

* Based on 2005 Peer Mortgage Data: Eastern Region.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement 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 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: State of Michigan Evaluation Period: January 1, 2003 TO December 31, 2006				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% 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:																
Detroit – Warren AA	2,879	19.73	0.85	0.35	18.11	15.32	51.58	54.25	29.46	30.08	0.52	0.11	0.48	0.60	0.41	
Limited Review:																
Benton Harbor AA	91	0.62	0.00	0.00	9.50	19.78	84.52	73.63	5.98	6.59	1.56	0.00	3.50	1.41	0.82	
Detroit – Wayne AA	567	3.89	3.81	3.00	22.11	13.58	38.26	35.98	35.82	47.44	0.15	0.19	0.14	0.13	0.19	
Dowagiac AA	143	0.98	0.00	0.00	14.63	16.78	85.37	83.22	0.00	0.00	1.08	0.00	1.75	0.98	0.00	
Grand Rapids AA	2,313	15.85	1.00	0.56	15.20	13.66	58.53	54.99	25.28	30.78	1.91	1.01	1.78	1.93	2.01	
Holland-Grand Haven AA	1,758	12.05	0.00	0.00	4.67	4.95	91.47	88.28	3.87	6.77	3.01	0.00	3.11	2.94	4.34	
Kalamazoo AA	226	1.55	2.27	1.77	11.27	9.73	50.65	41.15	35.81	47.35	0.42	0.00	0.28	0.41	0.53	
Muskegon AA	1,114	7.64	3.33	3.86	15.03	16.61	54.98	53.23	26.66	26.30	3.82	4.39	3.79	3.97	3.45	
Non-MSA AA	5,499	37.69	0.00	0.00	6.27	3.80	75.04	70.83	18.69	25.55	5.32	0.00	3.89	5.48	5.10	

* Based on 2005 Peer Mortgage Data: Eastern Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance 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 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: State of Michigan								Evaluation Period: January 1, 2003 TO December 31, 2006					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Detroit – Warren AA	6	31.58	5.29	0.00	25.86	16.67	56.36	66.67	12.49	16.67	1.90	0.00	0.00	1.52	11.1
Limited Review:															
Benton Harbor AA	0	0.00	0.00	0.00	28.85	0.00	71.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Detroit – Wayne AA	1	5.26	13.15	0.00	27.75	100.0	35.30	0.00	23.80	0.00	1.11	0.00	2.78	0.00	0.00
Dowagiac AA	0	0.00	0.00	0.00	77.44	0.00	22.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grand Rapids AA	4	21.05	0.80	0.00	19.69	50.00	68.28	50.00	11.23	0.00	5.13	0.00	8.33	4.35	0.00
Holland-Grand Haven AA	0	0.00	0.00	0.00	4.25	0.00	94.68	0.00	1.07	0.00	0.00	0.00	0.00	0.00	0.00
Kalamazoo AA	0	0.00	10.12	0.00	23.21	0.00	54.93	0.00	11.74	0.00	0.00	0.00	0.00	0.00	0.00
Muskegon AA	0	0.00	11.91	0.00	42.97	0.00	27.84	0.00	17.28	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA AA	8	42.11	0.00	0.00	9.08	12.50	74.46	50.00	16.46	37.50	11.76	0.00	0.00	14.29	0.00

* Based on 2005 Peer Mortgage Data: Eastern Region.

** 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: State of Michigan Evaluation Period: January 1, 2003 TO December 31, 2006															
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:															
Detroit – Warren AA	5,288	33.56	2.30	2.99	17.48	25.04	49.86	47.20	30.17	24.77	2.24	3.13	3.20	2.18	1.84
Limited Review:															
Benton Harbor AA	229	1.45	0.00	0.00	16.33	26.64	79.08	66.38	4.59	6.99	1.56	0.00	4.01	1.73	0.76
Detroit – Wayne AA	971	6.16	6.49	7.83	23.69	37.59	34.91	31.41	34.38	23.17	0.82	1.47	1.68	0.60	0.54
Dowagiac AA	227	1.44	0.00	0.00	25.92	27.75	74.08	72.25	0.00	0.00	5.30	0.00	7.39	5.06	0.00
Grand Rapids AA	3,230	20.50	2.28	2.41	17.56	13.37	53.32	59.20	26.84	25.02	4.20	3.30	3.79	5.06	3.28
Holland-Grand Haven AA	1,454	9.23	0.00	0.00	8.53	4.61	88.99	93.95	2.48	1.44	4.74	0.00	2.71	5.00	3.13
Kalamazoo AA	269	1.71	3.13	4.83	20.41	22.68	48.17	50.56	28.29	21.93	1.20	3.82	1.42	1.26	0.88
Muskegon AA	637	4.04	4.92	6.12	20.00	25.75	43.66	41.29	31.42	26.84	4.41	6.43	6.19	3.76	4.19
Non-MSA AA	3,452	21.91	0.00	0.00	6.59	5.16	73.28	73.00	20.13	21.84	5.03	0.00	4.95	6.33	4.69

* Based on 2005 Peer Small Business Data: US.

** 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 2006.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: State of Michigan					Evaluation Period: January 1, 2003 TO December 31, 2006				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Detroit – Warren AA	4	2.48	1.46	0.00	16.12	100.0	58.35	0.00	24.07	0.00	0.53	0.00	3.70	0.00	0.00									
Limited Review:																								
Benton Harbor AA	3	1.86	0.00	0.00	2.33	0.00	81.86	100.0	15.81	0.00	2.42	0.00	0.00	2.91	0.00									
Detroit – Wayne AA	0	0.00	3.24	0.00	16.52	0.00	40.64	0.00	39.29	0.00	0.00	0.00	0.00	0.00	0.00									
Dowagiac AA	4	2.48	0.00	0.00	4.41	0.00	95.59	100.0	0.00	0.00	2.86	0.00	0.00	2.94	0.00									
Grand Rapids AA	65	40.37	0.18	0.00	7.39	12.31	69.05	73.85	23.38	13.85	11.49	0.00	14.29	11.8	11.8									
Holland-Grand Haven AA	15	9.32	0.00	0.00	1.54	0.00	97.56	100.0	0.90	0.00	3.68	0.00	0.00	3.70	0.00									
Kalamazoo AA	0	0.00	1.11	0.00	11.83	0.00	50.09	0.00	36.97	0.00	0.00	0.00	0.00	0.00	0.00									
Muskegon AA	8	4.97	1.43	0.00	6.81	0.00	73.12	100.0	18.64	0.00	13.64	0.00	0.00	18.8	0.00									
Non-MSA AA	62	38.52	0.00	0.00	3.31	4.84	75.34	79.03	21.35	16.13	4.05	0.00	6.67	4.72	1.37									

* Based on 2005 Peer Small Business Data: US.

** 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 2006.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: State of Michigan						Evaluation Period: January 1, 2003 TO December 31, 2006							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Detroit – Warren AA	1,246	16.54	18.03	17.46	18.20	33.03	23.57	21.48	40.21	28.03	0.54	0.60	0.52	0.46	0.58
Limited Review:															
Benton Harbor AA	14	0.19	19.42	14.29	20.00	50.00	24.45	28.57	36.13	7.14	0.45	0.00	0.00	1.32	0.34
Detroit – Wayne AA	412	5.47	23.09	5.45	16.60	25.99	19.31	27.72	41.01	40.84	0.19	0.04	0.22	0.18	0.21
Dowagiac AA	49	0.65	19.26	12.24	20.37	40.82	24.84	20.41	35.53	26.53	1.20	1.01	2.67	1.03	0.57
Grand Rapids AA	1,311	17.41	18.29	8.12	18.78	24.67	24.39	26.87	38.55	40.35	1.87	1.01	1.21	1.74	3.07
Holland-Grand Haven AA	1,011	13.42	14.28	17.43	19.85	31.10	29.77	26.24	36.09	25.23	4.61	6.20	4.02	3.68	5.56
Kalamazoo AA	412	5.47	17.89	9.58	17.69	27.76	23.20	29.24	41.21	33.42	2.45	2.34	2.46	2.46	2.47
Muskegon AA	539	7.16	19.62	20.83	18.74	29.83	22.87	24.95	38.77	24.39	3.80	5.37	3.52	3.55	3.53
Non-MSA AA	2,537	33.69	16.16	8.71	18.66	20.58	24.48	69.26	40.70	25.66	6.37	7.11	6.21	6.97	6.03

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by Bank.

*** 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: State of Michigan				Evaluation Period: January 1, 2003 TO December 31, 2006								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Detroit – Warren AA	405	23.20	18.03	21.75	18.20	25.25	23.57	28.00	40.21	25.00	1.54	2.04	1.12	1.78	1.44
Limited Review:															
Benton Harbor AA	15	0.86	19.42	13.33	20.00	53.33	24.45	6.67	36.13	26.67	2.74	0.00	11.4	0.00	0.00
Detroit – Wayne AA	80	4.58	23.09	21.79	16.60	23.08	19.31	23.08	41.01	32.05	0.26	0.45	0.14	0.18	0.33
Dowagiac AA	30	1.72	19.26	31.03	20.37	31.03	24.84	31.03	35.53	6.90	3.72	11.5	2.94	3.77	1.33
Grand Rapids AA	236	13.52	18.29	21.37	18.78	28.63	24.39	23.93	38.55	26.07	1.81	1.24	1.60	1.51	2.57
Holland-Grand Haven AA	144	8.25	14.28	14.58	19.85	27.08	29.77	32.64	36.09	25.69	3.32	2.70	3.75	2.75	3.85
Kalamazoo AA	29	1.66	17.89	11.11	17.69	40.74	23.20	7.41	41.21	40.74	0.82	0.00	2.35	0.00	0.75
Muskegon AA	136	7.79	19.62	25.76	18.74	29.55	22.87	21.21	38.77	23.48	4.02	6.49	4.52	1.90	4.46
Non-MSA AA	671	38.43	16.16	14.75	18.66	22.65	24.48	28.46	40.70	33.08	8.95	12.1	9.93	8.51	7.81

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by Bank.

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: State of Michigan				Evaluation Period: January 1, 2003 TO December 31, 2006								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid
Full Review:																
Detroit – Warren AA	2,879	19.73	18.03	17.39	18.20	26.61	23.57	26.33	40.21	29.67	0.63	0.94	0.62	0.58	0.55	
Limited Review:																
Benton Harbor AA	91	0.62	19.42	14.44	20.00	32.22	24.45	23.33	36.13	30.00	1.93	0.80	2.81	2.13	1.42	
Detroit – Wayne AA	567	3.89	23.09	8.17	16.60	14.34	19.31	25.95	41.01	51.54	0.19	0.16	0.07	0.18	0.29	
Dowagiac AA	143	0.98	19.26	19.72	20.37	31.69	24.84	26.76	35.53	21.83	1.30	2.73	2.00	0.48	0.98	
Grand Rapids AA	2,313	15.85	18.29	13.06	18.78	24.64	24.39	27.55	38.55	34.75	2.35	2.73	1.94	2.12	2.75	
Holland-Grand Haven AA	1,758	12.05	14.28	15.42	19.85	29.39	29.77	32.07	36.09	23.11	3.82	4.69	3.81	4.14	3.01	
Kalamazoo AA	226	1.55	17.89	10.76	17.69	24.22	23.20	29.60	41.21	35.43	0.52	0.00	0.50	0.79	0.48	
Muskegon AA	1,114	7.64	19.62	14.84	18.74	28.02	22.87	28.02	38.77	29.12	4.63	7.29	4.64	4.05	4.12	
Non-MSA AA	5,499	37.69	16.16	8.98	18.66	22.31	24.48	28.21	40.70	38.50	6.71	9.10	8.23	6.92	5.45	

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 4.4% of loans originated and purchased by Bank.

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: State of Michigan		Evaluation Period: January 1, 2003 TO December 31, 2006		
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:									
Detroit – Warren AA	5,292	33.49	68.21	59.32	83.92	8.22	7.86	2.24	3.19
Limited Review:									
Benton Harbor AA	229	1.45	69.07	68.56	90.39	6.55	3.06	1.56	2.22
Detroit – Wayne AA	1,011	6.40	67.76	63.01	86.35	5.04	8.61	0.82	1.35
Dowagiac AA	227	1.44	63.38	81.94	92.95	5.73	1.32	5.30	8.97
Grand Rapids AA	3,230	20.44	65.78	64.21	83.50	7.46	9.04	4.20	5.97
Holland-Grand Haven AA	1,454	9.20	69.06	71.53	83.08	6.19	10.73	4.74	7.34
Kalamazoo AA	269	1.70	66.51	58.74	82.90	10.04	7.06	1.20	1.53
Muskegon AA	637	4.03	69.41	73.94	92.94	3.92	3.14	4.41	7.55
Non-MSA AA	3,452	21.85	68.51	72.86	87.08	6.69	6.23	5.03	7.35

* Based on 2005 Peer Small Business Data: US.

** 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- Year).

**** 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 5.74% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: State of Michigan		Evaluation Period: January 1, 2003 TO December 31, 2006		
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:									
Detroit – Warren AA	4	2.48	91.31	100.0	100.00	0.00	0.00	0.53	0.67
Limited Review:									
Benton Harbor AA	3	1.86	91.63	0.00	100.00	0.00	0.00	2.42	2.27
Detroit – Wayne AA	0	0.00	91.25	0.00	0.00	0.00	0.00	0.00	0.00
Dowagiac AA	4	2.48	94.24	100.00	100.00	0.00	0.00	2.86	3.70
Grand Rapids AA	65	40.37	92.13	76.92	95.38	0.00	4.62	11.49	11.88
Holland-Grand Haven AA	15	9.32	88.96	80.00	73.33	13.33	13.33	3.68	5.62
Kalamazoo AA	0	0.00	85.95	0.00	0.00	0.00	0.00	0.00	0.00
Muskegon AA	8	4.97	91.04	0.00	62.50	37.50	0.00	13.64	0.00
Non-MSA AA	62	38.52	89.78	88.71	91.94	8.06	0.00	4.05	4.89

* Based on 2005 Peer Small Business Data: US.

** 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-Year).

**** 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 3.51% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: State of Michigan				Evaluation Period: January 1, 2003 TO December 31, 2006			
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:									
Detroit – Warren AA	1	30	36	2,981	37	3,011	22.87	3	79
Limited Review:									
Benton Harbor AA	0	0	1	195	1	195	1.48	1	13
Detroit – Wayne AA	1	110	35	2,634	36	2,744	20.84	4	2,054
Dowagiac AA	0	0	1	71	1	71	0.54	2	85
Grand Rapids AA	1	19	69	2,989	70	3,008	22.85	4	165
Holland-Grand Haven AA	1	14	19	1,132	20	1,146	8.70	4	445
Kalamazoo AA	0	0	15	96	15	96	0.73	2	46
Muskegon AA	1	21	7	144	8	165	1.25	1	0.49
Non-MSA AA	3	293	33	1,204	36	1,497	11.37	6	1,422
Statewide/Regional with Potential Benefit to One or More AAs	4	769	6	464	10	1,233	9.37	3	3,594

* '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: State of Michigan Evaluation Period: January 1, 2003 TO December 31, 2006																		
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:																		
Detroit – Warren AA	43.87	39	33.91	0.00	25.64	51.28	23.08	3	1	0	0	0	+2	1.86	19.57	50.75	27.80	
Limited Review:																		
Benton Harbor AA	0.76	1	0.87	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	12.28	83.06	4.67	
Detroit – Wayne AA	1.74	4	3.48	0.00	50.00	25.00	25.00	1	0	0	0	0	+1	7.80	30.49	33.77	27.85	
Dowagiac AA	0.73	1	0.87	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	18.66	8.34	0.00	
Grand Rapids AA	23.65	22	19.13	0.00	13.64	59.09	27.27	2	3	0	0	-1	0	2.17	19.73	55.05	22.04	
Holland-Grand Haven AA	8.34	10	8.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	5.86	90.83	3.31	
Kalamazoo AA	1.16	2	1.74	0.00	50.00	50.00	0.00	0	0	0	0	0	0	7.82	16.76	46.63	28.79	
Muskegon AA	3.05	5	4.35	20.00	20.00	20.00	40.00	0	1	0	-1	0	0	5.82	21.98	48.81	23.40	
Non-MSA AA	16.70	31	26.95	0.00	9.68	77.42	12.90	0	4	0	0	-4	0	0.00	7.00	75.25	17.74	

Table 1. Lending Volume

LENDING VOLUME												
Geography: State of Ohio												
Evaluation Period: January 1, 2003 TO December 31, 2006												
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:												
Columbus AA	45.78	20,060	2,924,497	10,773	952,079	238	21,270	88	96,195	31,159	3,994,041	54.65
Limited Review:												
Akron AA	3.42	1,354	162,609	957	90,189	4	60	12	7,425	2,327	260,283	2.85
Canton AA	2.36	1,314	161,238	274	16,293	15	1,009	0	0	1,603	178,540	5.15
Cleveland AA	21.16	7,367	901,101	6,985	625,143	18	970	33	63,704	14,403	1,590,918	14.28
Dayton AA	3.49	1,392	151,008	976	113,281	0	0	5	881	2,373	265,170	3.08
Green AA	0.14	67	11,277	25	4,029	0	0	0	0	92	15,306	0.09
Lima AA	1.79	495	56,172	679	80,146	42	2,801	5	4,673	1,221	143,792	2.09
Mansfield AA	0.99	343	31,014	317	37,000	7	552	10	5,882	677	74,448	0.34
Springfield AA	2.43	788	65,374	781	61,177	79	5,895	7	643	1,655	133,089	0.66
Toledo AA	8.29	3,178	342,937	2,342	214,290	113	7,226	12	17,175	5,645	581,628	1.61
Wadsworth/Medina AA	0.31	115	9433	93	8,671	3	109	1	1,135	212	19,348	6.38
Non-MSA AA	9.84	3,793	350,065	2,401	194,020	439	33,160	32	41,797	6,696	657,435	8.80
State/Regional Loans	0.00	0	0	0	0	0	0	31	38,393	31	38,393	

* Loan Data as of December 31, 2006. 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 December 31, 2006.

*** Deposit Data as of June 30, 2006. 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: State of Ohio				Evaluation Period: January 1, 2003 TO December 31, 2006					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% 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:																
Columbus AA	10,825	55.47	3.04	3.36	17.70	9.33	44.28	35.37	34.98	51.94	5.26	4.44	3.33	4.62	6.57	
Limited Review:																
Akron AA	559	2.86	0.00	0.00	3.78	3.22	48.80	46.15	47.42	50.63	1.56	0.00	2.99	1.83	1.23	
Canton AA	747	3.83	1.00	0.40	14.85	8.97	63.33	67.47	20.82	23.16	1.36	2.86	1.15	1.42	1.31	
Cleveland AA	3,061	15.69	5.60	3.27	12.56	11.50	46.87	50.05	34.98	35.18	1.18	0.50	0.97	1.33	1.27	
Dayton AA	612	3.14	2.58	1.96	17.51	10.78	44.94	42.97	34.98	44.28	0.74	0.86	0.66	0.77	0.73	
Green AA	37	0.19	0.00	0.00	0.00	0.00	71.42	89.19	28.58	10.81	1.04	0.00	0.00	0.90	1.39	
Lima AA	171	0.88	1.24	2.34	19.97	20.47	56.56	39.77	22.23	37.43	2.11	0.00	3.01	1.60	2.56	
Mansfield AA	125	0.64	0.16	0.00	14.17	10.40	58.08	45.60	27.58	44.00	1.46	0.00	1.68	1.30	1.67	
Springfield AA	207	1.06	1.73	1.45	9.72	9.18	59.32	62.80	29.23	26.57	1.54	1.67	2.29	1.60	1.07	
Toledo AA	1,386	7.10	2.94	3.10	15.05	13.35	52.96	49.93	29.05	33.62	2.60	2.69	2.28	2.67	2.63	
Wadsworth/Medina AA	33	0.17	0.00	0.00	0.00	0.00	65.49	60.61	34.51	39.39	0.69	0.00	0.00	0.56	0.92	
Non-MSA AA	1,752	8.97	0.00	0.00	10.63	9.70	78.76	80.42	10.61	9.87	7.11	0.00	5.83	7.60	4.77	

* Based on 2005 Peer Mortgage Data: Eastern Region.

** 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: State of Ohio				Evaluation Period: January 1, 2003 TO December 31, 2006									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
Columbus AA	782	32.51	3.04	6.14	17.70	19.57	44.28	43.86	34.98	30.43	3.98	9.79	3.63	3.94	3.50
Limited Review:															
Akron AA	116	4.82	0.00	0.00	3.78	5.17	48.80	69.83	47.42	25.00	2.21	0.00	2.11	2.58	1.71
Canton AA	48	2.00	1.00	0.00	14.85	18.75	63.33	62.50	20.82	18.75	0.74	0.00	0.00	0.81	1.20
Cleveland AA	664	27.61	5.60	6.33	12.56	17.02	46.87	51.51	34.98	25.15	2.05	2.11	1.89	2.26	1.72
Dayton AA	64	2.66	2.58	1.56	17.51	10.94	44.94	43.75	34.98	43.75	0.77	0.00	0.00	0.89	1.17
Green AA	0	0.00	0.00	0.00	0.00	0.00	71.42	0.00	28.58	0.00	0.00	0.00	0.00	0.00	0.00
Lima AA	67	2.79	1.24	2.99	19.97	41.79	56.56	44.78	22.23	10.45	7.05	40.00	10.26	7.25	1.27
Mansfield AA	42	1.75	0.16	2.38	14.17	26.19	58.08	52.38	27.58	19.05	1.03	0.00	0.93	1.58	0.00
Springfield AA	82	3.41	1.73	3.66	9.72	15.85	59.32	54.88	29.23	25.61	5.00	10.00	10.00	4.07	4.55
Toledo AA	231	9.60	2.94	5.19	15.05	18.61	52.96	54.11	29.05	22.08	2.78	3.45	1.58	2.94	3.26
Wadsworth/Medina AA	35	1.46	0.00	0.00	0.00	0.00	65.49	65.71	34.51	34.29	6.90	0.00	0.00	7.41	6.06
Non-MSA AA	274	11.39	0.00	0.00	10.63	13.50	78.76	78.10	10.61	8.39	5.88	0.00	6.57	5.86	5.30

* Based on 2005 Peer Mortgage Data: Eastern Region.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement 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 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: State of Ohio Evaluation Period: January 1, 2003 TO December 31, 2006				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% 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:																
Columbus AA	8,452	47.89	3.04	3.45	17.70	11.39	44.28	38.11	34.98	47.04	2.84	3.25	2.08	2.75	3.25	
Limited Review:																
Akron AA	678	3.84	0.00	0.00	3.78	3.54	48.80	56.19	47.42	40.27	0.95	0.00	1.02	1.13	0.71	
Canton AA	519	2.94	1.00	0.00	14.85	7.90	63.33	63.39	20.82	28.71	0.60	0.00	0.34	0.64	0.73	
Cleveland AA	2,951	16.72	5.60	3.54	12.56	10.17	46.87	45.70	34.98	40.59	0.94	0.78	0.89	0.89	1.11	
Dayton AA	715	4.05	2.58	1.54	17.51	9.93	44.94	44.76	34.98	43.78	0.67	0.26	0.32	0.66	0.89	
Green AA	30	0.17	0.00	0.00	0.00	0.00	71.42	90.00	28.58	10.00	1.01	0.00	0.00	1.26	0.47	
Lima AA	257	1.46	1.24	0.00	19.97	17.90	56.56	48.25	22.23	33.85	2.09	0.00	1.44	2.08	2.76	
Mansfield AA	175	0.99	0.16	0.00	14.17	12.00	58.08	57.71	27.58	30.29	1.13	0.00	0.78	1.33	0.90	
Springfield AA	499	2.83	1.73	1.00	9.72	11.22	59.32	54.91	29.23	32.87	2.17	3.53	2.53	2.05	2.17	
Toledo AA	1,561	8.84	2.94	1.02	15.05	10.63	52.96	54.58	29.05	33.76	1.81	0.60	1.47	1.95	1.84	
Wadsworth/Medina AA	47	0.27	0.00	0.00	0.00	0.00	65.49	65.96	34.51	34.04	1.48	0.00	0.00	1.78	0.89	
Non-MSA AA	1,765	10.00	0.00	0.00	10.63	8.90	78.76	80.23	10.61	10.93	3.94	0.00	2.03	3.97	5.60	

* Based on 2005 Peer Mortgage Data: Eastern Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance 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 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: State of Ohio								Evaluation Period: January 1, 2003 TO December 31, 2006				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Columbus AA	1	9.09	12.31	0.00	31.70	0.00	34.82	100.00	21.16	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Akron AA	1	9.09	0.00	0.00	19.50	0.00	47.64	100.00	32.86	0.00	0.00	0.00	0.00	0.00	0.00
Canton AA	0	0.00	6.14	0.00	16.17	0.00	48.81	0.00	28.88	0.00	0.00	0.00	0.00	0.00	0.00
Cleveland AA	3	27.28	13.69	33.34	25.68	0.00	43.01	33.33	17.61	33.33	0.35	0.00	0.00	1.04	0.00
Dayton AA	1	9.09	10.20	0.00	21.21	0.00	45.74	100.00	22.84	0.00	0.00	0.00	0.00	0.00	0.00
Green/Akron AA	0	0.00	0.00	0.00	0.00	0.00	75.77	0.00	24.23	0.00	0.00	0.00	0.00	0.00	0.00
Lima AA	0	0.00	10.31	0.00	43.37	0.00	37.90	0.00	8.43	0.00	0.00	0.00	0.00	0.00	0.00
Mansfield AA	1	9.09	1.06	0.00	25.75	0.00	53.27	100.00	19.92	0.00	7.14	0.00	0.00	16.7	0.00
Springfield AA	0	0.00	4.16	0.00	21.72	0.00	70.62	0.00	3.49	0.00	0.00	0.00	0.00	0.00	0.00
Toledo AA	0	0.00	7.25	0.00	21.82	0.00	53.40	0.00	17.53	0.00	0.00	0.00	0.00	0.00	0.00
Wadsworth/Medina AA	0	0.00	0.00	0.00	0.00	0.00	64.72	0.00	35.28	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA AA	2	18.18	0.00	0.00	18.52	0.00	66.73	100.00	14.75	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2005 Peer Mortgage Data: Eastern Region.

** 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: State of Ohio					Evaluation Period: January 1, 2003 TO December 31, 2006				
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:																					
Columbus AA	10,773	40.38	7.45	6.67	18.81	16.27	39.53	37.68	34.21	39.38	7.16	9.65	7.28	7.32	7.00						
Limited Review:																					
Akron AA	1,034	3.88	0.00	0.00	3.66	5.85	45.95	55.28	50.39	38.87	2.05	0.00	1.35	2.40	2.08						
Canton AA	274	1.03	4.11	2.92	15.47	9.85	55.15	57.66	25.27	29.56	0.67	0.37	1.06	0.62	0.70						
Cleveland AA	6,985	26.18	8.73	5.76	15.14	13.93	39.04	36.94	36.15	42.52	4.05	4.13	4.37	3.74	4.41						
Dayton AA	976	3.66	8.40	7.79	19.84	17.11	38.59	35.66	33.17	39.45	1.54	2.04	1.41	1.56	1.60						
Green AA	25	0.09	0.00	0.00	0.00	0.00	54.09	64.00	45.91	36.00	1.39	0.00	0.00	1.15	1.90						
Lima AA	679	2.54	9.40	5.30	20.90	39.32	50.07	36.38	19.63	19.00	6.88	4.71	13.7	5.38	5.65						
Mansfield AA	317	1.19	3.50	6.31	20.56	23.66	51.39	47.63	24.55	22.40	2.40	4.39	2.33	2.75	1.80						
Springfield AA	781	2.93	2.95	4.87	18.38	23.43	54.18	53.14	24.49	18.57	7.00	12.5	8.99	7.53	4.95						
Toledo AA	2,342	8.78	4.78	3.76	12.91	10.25	51.34	53.03	30.97	32.96	4.49	5.70	4.01	4.99	4.18						
Wadsworth/Medina AA	93	0.35	0.00	0.00	0.00	0.00	66.57	73.12	33.43	26.88	2.22	0.00	0.00	2.18	2.36						
Non-MSA AA	2,401	8.99	0.00	0.00	13.11	7.33	77.48	82.92	9.40	9.75	6.75	0.00	5.20	7.26	6.60						

* Based on 2005 Peer Small Business Data: US.

** 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 2006.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: State of Ohio Evaluation Period: January 1, 2003 TO December 31, 2006														
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*																		
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp														
Full Review:																													
Columbus AA	238	24.84	1.56	0.00	10.59	1.26	58.42	77.73	29.42	21.01	12.90	0.00	2.56	13.0	17.4														
Limited Review:																													
Akron AA	4	0.42	0.00	0.00	2.66	100.0	63.83	0.00	33.51	0.00	1.11	0.00	16.7	0.00	0.00														
Canton AA	15	1.57	1.16	0.00	7.76	13.33	70.76	86.67	20.31	0.00	12.28	0.00	50.0	14.0	0.00														
Cleveland AA	18	1.88	2.77	0.00	7.00	0.00	46.66	77.78	43.39	22.22	2.72	0.00	0.00	4.55	1.41														
Dayton AA	0	0.00	1.50	0.00	11.55	0.00	54.62	0.00	32.33	0.00	4.78	0.00	0.00	5.86	0.00														
Green AA	0	0.00	0.00	0.00	0.00	0.00	74.36	0.00	25.64	0.00	0.00	0.00	0.00	0.00	0.00														
Lima AA	42	4.38	1.59	0.00	3.85	0.00	73.70	100.00	20.86	0.00	3.59	0.00	0.00	4.19	0.00														
Mansfield AA	7	0.73	0.29	0.00	3.14	0.00	70.29	85.71	26.29	14.29	4.08	0.00	0.00	5.88	0.00														
Springfield AA	79	8.25	0.82	0.00	4.40	0.00	50.00	40.51	44.78	59.49	16.56	0.00	0.00	16.3	17.3														
Toledo AA	113	11.80	1.06	0.00	4.75	0.00	66.34	82.30	27.85	17.70	13.09	0.00	0.00	12.9	15.9														
Wadsworth/Medina AA	3	0.31	0.00	0.00	0.00	0.00	62.16	100.00	37.84	0.00	0.00	0.00	0.00	0.00	0.00														
Non-MSA AA	439	45.82	0.00	0.00	3.60	0.91	87.09	90.21	9.31	8.88	28.33	0.00	0.00	31.9	16.1														

* Based on 2005 Peer Small Business Data: US.

** 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 2006.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: State of Ohio						Evaluation Period: January 1, 2003 TO December 31, 2006							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Columbus AA	10,825	55.47	19.30	8.89	18.28	27.92	22.99	28.40	39.42	34.80	6.07	5.09	6.45	7.06	5.32
Limited Review:															
Akron AA	559	2.86	12.99	7.87	15.38	22.36	22.76	32.92	48.86	34.70	1.78	3.11	1.80	1.89	1.47
Canton AA	747	3.83	17.39	10.72	19.20	25.92	23.89	31.75	39.52	31.61	1.65	1.38	2.09	1.35	1.64
Cleveland AA	3,061	15.69	21.15	10.09	18.21	31.53	21.80	26.17	38.85	28.45	1.29	1.07	1.43	1.41	1.12
Dayton AA	612	3.14	19.44	11.48	18.34	29.28	22.05	27.12	40.17	32.11	0.85	1.17	1.05	0.87	0.60
Green AA	37	0.19	13.55	2.78	15.58	16.67	21.84	25.00	49.04	55.56	1.23	0.00	0.89	1.60	1.27
Lima AA	171	0.88	19.16	12.57	18.83	21.56	22.82	16.77	39.19	49.10	2.42	2.83	3.26	1.79	2.19
Mansfield AA	125	0.64	17.95	10.57	19.32	25.20	23.37	32.52	39.36	31.71	1.65	0.82	0.71	2.81	1.68
Springfield AA	207	1.06	18.75	14.87	18.55	32.82	24.25	25.13	38.44	27.18	1.65	2.28	1.92	1.33	1.34
Toledo AA	1,386	7.10	20.77	13.52	17.74	26.52	22.30	27.70	39.19	32.26	2.95	4.26	2.99	2.86	2.61
Wadsworth/Medina AA	33	0.17	13.19	16.67	15.19	50.00	26.48	13.33	45.14	20.00	0.82	0.00	2.05	0.40	0.71
Non-MSA AA	1,752	8.97	17.85	12.27	19.38	28.77	24.40	30.19	38.37	26.94	8.47	8.06	10.1	8.37	7.51

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by Bank.

*** 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: State of Ohio						Evaluation Period: January 1, 2003 TO December 31, 2006							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families* **	% BANK Loans*** *	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Columbus AA	782	32.51	19.30	17.32	18.28	22.31	22.99	27.17	39.42	33.20	4.02	6.27	3.66	3.70	3.80
Limited Review:															
Akron AA	116	4.82	12.99	17.24	15.38	25.00	22.76	31.03	48.86	26.72	2.25	4.44	2.09	1.79	1.95
Canton AA	48	2.00	17.39	12.50	19.20	29.17	23.89	33.33	39.52	25.00	0.76	0.76	0.93	1.02	0.36
Cleveland AA	664	27.26	21.15	19.43	18.21	25.75	21.80	26.96	38.85	27.26	2.08	2.05	2.04	2.14	2.07
Dayton AA	64	2.66	19.44	12.50	18.34	21.88	22.05	17.19	40.17	48.44	0.79	1.46	0.26	0.24	1.33
Green AA	0	0.00	13.55	0.00	15.58	0.00	21.84	0.00	49.04	0.00	0.00	0.00	0.00	0.00	0.00
Lima AA	67	2.79	19.16	31.34	18.83	34.33	22.82	16.42	39.19	17.91	7.26	17.3	10.0	2.06	5.04
Mansfield AA	42	1.75	17.95	19.05	19.32	21.43	23.37	26.19	39.36	33.33	1.05	0.00	1.43	1.76	0.57
Springfield AA	82	3.41	18.75	12.50	18.55	30.00	24.25	27.50	38.44	30.00	4.66	3.64	6.03	4.67	3.97
Toledo AA	231	9.60	20.77	20.96	17.74	18.78	22.30	27.07	39.19	33.19	2.79	2.62	2.98	2.53	2.96
Wadsworth/Medina AA	35	1.46	13.19	28.57	15.19	22.86	26.48	20.00	45.14	28.57	7.06	20.0	18.2	6.67	2.56
Non-MSA AA	274	11.39	17.85	17.88	19.38	25.55	24.40	24.82	38.37	31.39	6.03	5.47	7.33	5.41	5.98

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by Bank.

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: State of Ohio					Evaluation Period: January 1, 2003 TO December 31, 2006				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*										
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp						
Full Review:																					
Columbus AA	8,452	47.89	19.30	9.23	18.28	19.62	22.99	24.82	39.42	46.33	3.41	3.60	3.29	2.97	3.74						
Limited Review:																					
Akron AA	678	3.84	12.99	10.32	15.38	20.94	22.76	26.99	48.86	36.87	1.03	1.18	1.17	1.09	0.85						
Canton AA	519	2.94	17.39	8.12	19.20	22.38	23.89	29.50	39.52	40.00	0.72	0.29	0.97	0.56	0.85						
Cleveland AA	2,951	16.72	21.15	9.26	18.21	21.96	21.80	24.84	38.85	34.82	0.98	0.85	0.89	1.05	1.06						
Dayton AA	715	4.05	19.44	7.61	18.34	20.75	22.05	26.27	40.17	45.37	0.82	0.57	0.65	0.53	1.25						
Green AA	30	0.17	13.55	3.33	15.58	13.33	21.84	30.00	49.04	53.33	1.23	2.38	1.92	0.52	1.30						
Lima AA	257	1.46	19.16	14.52	18.83	16.53	22.82	20.97	39.19	47.98	2.37	5.16	2.61	1.20	2.34						
Mansfield AA	175	0.99	17.95	12.21	19.32	16.28	23.37	26.74	39.36	44.77	1.35	3.02	0.52	1.64	1.15						
Springfield AA	499	2.83	18.75	12.00	18.55	25.68	24.25	29.05	38.44	33.26	2.61	2.85	3.22	2.52	2.13						
Toledo AA	1,561	8.84	20.77	12.16	17.74	22.04	22.30	26.62	39.19	39.18	2.21	3.35	2.32	2.05	1.91						
Wadsworth/Medina AA	47	0.27	13.19	19.57	15.19	19.57	26.48	32.61	45.14	28.26	1.80	4.00	0.76	1.60	2.14						
Non-MSA AA	1,765	10.00	17.85	10.59	19.38	20.06	24.40	31.16	38.37	35.69	4.79	4.91	4.44	4.19	5.48						

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 4.4% of loans originated and purchased by Bank.

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: State of Ohio		Evaluation Period: January 1, 2003 TO December 31, 2006			
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:										
Columbus AA	10,773	40.38	62.95	63.86	84.61	7.38	8.01	7.16	10.97	
Limited Review:										
Akron AA	1,034	3.88	64.38	56.48	76.89	7.45	15.67	2.05	2.95	
Canton AA	274	1.03	66.05	64.96	88.32	5.84	5.84	0.67	1.08	
Cleveland AA	6,985	26.18	63.25	64.28	85.38	6.83	7.79	4.05	6.20	
Dayton AA	976	3.66	63.53	58.09	78.07	8.20	13.73	1.54	2.09	
Green AA	25	0.09	63.69	52.00	56.00	24.00	20.00	1.39	1.96	
Lima AA	679	2.54	59.24	60.24	74.82	13.70	11.49	6.88	9.69	
Mansfield AA	317	1.19	65.39	65.62	76.34	11.04	12.62	2.40	3.39	
Springfield AA	781	2.93	61.88	65.81	86.30	7.55	6.15	7.00	9.57	
Toledo AA	2,342	8.78	63.94	67.34	82.11	8.11	9.78	4.49	6.78	
Wadsworth/Medina AA	93	0.35	67.65	62.37	88.17	1.08	10.75	2.22	3.43	
Non-MSA AA	2,401	8.99	61.27	70.05	83.30	10.16	6.54	6.75	10.39	

* Based on 2005 Peer Small Business Data: US.

** 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- Year).

**** 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 5.74% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: State of Ohio		Evaluation Period: January 1, 2003 TO December 31, 2006			
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:									
Columbus AA	238	24.84	93.29	93.28	73.11	18.91	7.98	12.90	16.85
Limited Review:									
Akron AA	4	0.42	90.60	25.00	100.0	0.00	0.00	1.11	0.00
Canton AA	15	1.57	95.47	86.67	86.67	13.33	0.00	12.28	11.63
Cleveland AA	18	1.88	87.73	72.22	88.88	5.56	5.56	2.72	2.90
Dayton AA	0	0.00	91.34	0.00	0.00	0.00	0.00	4.78	5.28
Green AA	0	0.00	94.87	0.00	0.00	0.00	0.00	0.00	0.00
Lima AA	42	4.38	96.15	90.48	78.57	16.67	4.76	3.59	3.70
Mansfield AA	7	0.73	96.57	100.0	57.14	42.86	0.00	4.08	5.00
Springfield AA	79	8.25	95.60	88.61	72.15	22.78	5.06	16.56	16.44
Toledo AA	113	11.80	93.04	95.58	88.50	6.19	5.31	13.09	14.57
Wadsworth/Medina AA	3	0.31	86.49	66.67	100.0	0.00	0.00	0.00	0.00
Non-MSA AA	439	45.82	96.14	96.58	75.85	20.73	3.42	28.33	31.25

* Based on 2005 Peer Small Business Data: US.

** 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-Year).

**** 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 3.51% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: State of Ohio				Evaluation Period: January 1, 2003 TO December 31, 2006				
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:										
Columbus AA	14	1,274	130	19,075	144	20,349	48.07	12	10,891	
Limited Review:										
Akron AA	9	523	8	383	17	906	2.14	4	1,069	
Canton AA	3	126	4	434	7	560	1.32	3	696	
Cleveland AA	10	1,755	76	7,333	86	9,088	21.47	6	2,337	
Dayton AA	4	133	24	727	28	860	2.03	5	1,571	
Green AA	0	0	0	0	0	0	0.00	0	0	
Lima AA	1	16	2	364	3	380	0.90	1	90	
Mansfield AA	3	109	2	160	5	269	0.64	3	437	
Springfield AA	4	70	12	450	16	520	1.23	1	2	
Toledo AA	5	209	14	2,331	19	2,540	6.00	3	1,053	
Wadsworth/Medina AA	0	0	0	0	0	0	0.00	0	0	
Non-MSA AA	6	169	5	301	11	470	1.11	6	1,302	
							0.00			
Statewide/Regional with Potential Benefit to One or More AAs	3	674	3	4,074	6	4,748	11.22	1	6,955	
Broader Regional Investments with No Potential Benefit to the AA	7	625	3	1,014	10	1,639	3.87	4	5,047	

* '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: State of Ohio Evaluation Period: January 1, 2003 TO December 31, 2006																		
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:																		
Columbus AA	54.65	58	29.29	10.34	20.69	27.59	41.38	8	11	0	0	-5	+2	6.38	22.87	40.85	29.45	
Limited Review:																		
Akron AA	2.85	12	6.06	0.00	16.67	50.00	33.33	1	0	0	0	0	+1	0.00	7.10	54.95	37.95	
Canton AA	5.15	16	8.08	6.25	18.75	56.25	18.75	0	0	0	0	0	0	2.03	17.52	60.40	20.05	
Cleveland AA	14.28	46	23.23	10.87	15.22	34.78	39.13	0	1	0	0	0	-1	11.38	16.69	41.48	30.42	
Dayton AA	3.08	11	5.56	9.09	0.00	36.36	54.55	0	2	0	0	0	-2	4.49	22.82	42.23	30.46	
Green AA	0.09	1	0.51	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	70.49	29.51	
Lima AA	2.09	4	2.02	0.00	50.00	25.00	25.00	0	0	0	0	0	0	2.94	24.02	53.54	19.50	
Mansfield AA	0.34	1	0.51	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.08	17.95	56.06	23.91	
Springfield AA	1.61	4	2.02	0.00	50.00	50.00	0.00	0	0	0	0	0	0	3.37	15.18	57.07	24.38	
Toledo AA	6.38	20	10.10	5.00	10.00	45.00	40.00	1	0	0	0	0	+1	6.56	18.90	48.84	25.71	
Wadsworth/Medina AA	0.66	1	0.51	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	66.66	33.34	
Non-MSA AA	8.80	24	12.12	0.00	8.33	83.34	8.33	0	1	0	-1	0	0	0.00	12.87	76.97	10.16	

Table 1. Lending Volume

LENDING VOLUME		Geography: State of West Virginia						Evaluation Period: January 1, 2003 TO December 31, 2006				
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:												
Charleston AA	31.13	1856	205,475	1,365	145,426	1	14	9	1,811	3,231	352,726	27.41
Limited Review:												
Huntington AA	9.35	632	52,397	325	21,453	1	3	12	3,195	970	77,048	9.16
Morgantown AA	20.29	1579	183,025	519	46,334	2	20	6	1,040	2,106	230,419	23.33
Parkersburg AA	3.73	241	17,590	143	12,946	0	0	3	699	387	31,235	6.11
Non-MSA AA	35.50	2,646	187,513	1,010	75,226	8	184	16	7,803	3,685	271,459	33.99
State/Regional Loans	0.00	0	0	0	0	0	0	9	732	9	732	

* Loan Data as of [Date]. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is [Date of Last CRA Evaluation] to [Start Date of CRA Data Analysis Phase].

*** Deposit Data as of [Date]. 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: State of West Virginia						Evaluation Period: January 1, 2003 TO December 31, 2006								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% 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
Full Review:																
Charleston AA	798	28.32	0.12	0.25	7.43	6.27	64.46	54.64	27.98	38.85	4.68	18.2	5.35	4.67	4.53	
Limited Review:																
Huntington AA	221	7.84	0.25	0.45	19.22	9.95	55.81	54.30	24.72	35.29	2.69	0.00	1.45	2.81	3.11	
Morgantown AA	740	26.26	0.00	0.00	11.81	11.35	40.55	25.14	47.65	63.51	9.63	0.00	7.69	9.59	9.98	
Parkersburg AA	75	2.66	0.00	0.00	11.15	9.33	72.50	73.33	16.35	17.33	1.15	0.00	1.01	1.27	0.77	
Non-MSA AA	984	34.92	0.00	0.00	1.93	5.79	74.13	69.72	23.93	24.49	10.92	0.00	15.3	13.2	7.31	

* Based on 2005 Peer Mortgage Data: Eastern Region.

** 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: State of West Virginia				Evaluation Period: January 1, 2003 TO December 31, 2006					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement 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:																
Charleston AA	126	17.24	0.12	0.00	7.43	10.32	64.46	69.05	27.98	20.63	3.81	0.00	5.63	4.62	1.79	
Limited Review:																
Huntington AA	99	13.54	0.25	1.01	19.22	20.20	55.81	59.60	24.72	19.19	5.07	0.00	5.63	3.09	10.00	
Morgantown AA	144	19.70	0.00	0.00	11.81	14.58	40.55	45.83	47.65	39.58	15.22	0.00	24.14	17.95	11.19	
Parkersburg AA	32	4.38	0.00	0.00	11.15	34.38	72.50	56.25	16.35	9.38	1.90	0.00	2.22	2.21	0.00	
Non-MSA AA	330	45.14	0.00	0.00	1.93	5.45	74.13	66.67	23.93	27.88	11.38	0.00	28.6	9.33	14.65	

* Based on 2005 Peer Mortgage Data: Eastern Region.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement 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 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: State of West Virginia Evaluation Period: January 1, 2003 TO December 31, 2006				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
Charleston AA	928	27.37	0.12	0.43	7.43	5.93	64.46	56.79	27.98	36.85	4.57	0.00	6.96	4.99	3.53
Limited Review:															
Huntington AA	311	9.17	0.25	0.00	19.22	12.54	55.81	64.31	24.72	23.15	3.35	0.00	4.76	3.33	2.83
Morgantown AA	687	20.26	0.00	0.00	11.81	9.02	40.55	39.01	47.65	51.97	10.5	0.00	6.37	13.6	9.42
Parkersburg AA	134	3.95	0.00	0.00	11.15	11.94	72.50	67.91	16.35	20.15	1.94	0.00	1.23	2.15	1.55
Non-MSA AA	1,331	39.25	0.00	0.00	1.93	4.43	74.13	73.70	23.93	21.86	10.4	0.00	7.14	12.0	7.41

* Based on 2005 Peer Mortgage Data: Eastern Region.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance 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 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: State of West Virginia						Evaluation Period: January 1, 2003 TO December 31, 2006							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Charleston AA	4	28.57	7.19	0.00	10.74	25.00	46.18	50.00	35.89	25.00	6.25	0.00	50.0	0.00	12.5
Limited Review:															
Huntington AA	1	7.14	22.34	0.00	23.18	100.0	24.07	0.00	30.40	0.00	0.00	0.00	0.00	0.00	0.00
Morgantown AA	8	57.15	0.00	0.00	19.71	0.00	22.92	75.00	57.37	25.00	12.9	0.00	0.00	21.4	10.0
Parkersburg AA	0	0.00	0.00	0.00	31.53	0.00	58.43	0.00	10.04	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA AA	1	7.14	0.00	0.00	11.10	0.00	66.45	0.00	22.45	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2005 Peer Mortgage Data: Eastern Region.

** 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: State of West Virginia						Evaluation Period: January 1, 2003 TO December 31, 2006						
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:															
Charleston AA	1,365	40.60	12.84	9.74	10.74	26.23	49.31	42.86	27.11	21.17	6.82	6.26	18.7	6.72	4.05
Limited Review:															
Huntington AA	325	9.67	14.39	21.54	18.40	16.00	42.58	45.23	24.62	17.23	4.11	5.41	3.91	4.33	4.18
Morgantown AA	519	15.44	0.00	0.00	19.88	21.97	36.51	30.44	43.61	47.59	6.61	0.00	8.81	6.24	6.89
Parkersburg AA	143	4.25	0.00	0.00	32.74	35.66	55.61	55.24	11.65	9.09	2.05	0.00	2.82	2.18	0.85
Non-MSA AA	1,010	30.04	0.00	0.00	10.01	9.90	64.58	64.55	25.40	25.54	7.59	0.00	11.69	8.83	6.86

* Based on 2005 Peer Small Business Data: US.

** 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 2006.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: State of West Virginia					Evaluation Period: January 1, 2003 TO December 31, 2006				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Charleston AA	1	8.33	1.25	0.00	7.92	0.00	60.42	0.00	30.42	100.00	0.00	0.00	0.00	0.00	0.00						
Limited Review:																					
Huntington AA	1	8.33	4.00	0.00	13.33	0.00	64.67	100.00	18.00	0.00	10.0	0.00	0.00	12.5	0.00						
Morgantown AA	2	16.67	0.00	0.00	9.76	0.00	40.24	0.00	50.00	100.00	0.00	0.00	0.00	0.00	0.00						
Parkersburg AA	0	0.00	0.00	0.00	20.69	0.00	58.62	0.00	20.69	0.00	0.00	0.00	0.00	0.00	0.00						
Non-MSA AA	8	66.67	0.00	0.00	7.08	0.00	70.35	75.00	22.57	25.00	5.56	0.00	0.00	2.44	20.0						

* Based on 2005 Peer Small Business Data: US.

** 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 2006.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: State of West Virginia						Evaluation Period: January 1, 2003 TO December 31, 2006						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Charleston AA	798	28.32	18.91	13.67	16.87	24.05	20.28	23.92	43.94	38.35	5.33	6.42	8.14	5.56	3.93
Limited Review:															
Huntington AA	221	7.84	22.95	15.07	17.81	24.20	20.14	27.85	39.11	32.88	2.98	5.63	3.35	3.76	2.00
Morgantown AA	740	26.26	18.60	5.90	17.16	13.58	19.68	26.89	44.57	53.64	11.2	16.0	8.82	10.6	11.5
Parkersburg AA	75	2.66	19.28	20.00	19.02	20.00	21.78	20.00	39.91	40.00	1.28	4.52	0.95	0.66	0.90
Non-MSA AA	984	34.92	17.89	11.79	16.61	22.76	20.43	25.30	45.07	38.92	12.6	23.5	19.2	13.9	8.80

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by Bank.

*** 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: State of West Virginia						Evaluation Period: January 1, 2003 TO December 31, 2006						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total **	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Over all	Low	Mod	Mid	Upp
Full Review:															
Charleston AA	126	17.24	18.91	14.75	16.87	25.41	20.28	24.59	43.94	35.25	3.90	5.93	3.14	4.21	3.31
Limited Review:															
Huntington AA	99	13.54	22.95	13.13	17.81	28.28	20.14	22.22	39.11	36.36	5.12	4.92	13.0	3.23	3.38
Morgantown AA	144	19.70	18.60	18.31	17.16	21.13	19.68	22.54	44.57	38.03	15.5	18.8	21.1	15.1	12.5
Parkersburg AA	32	4.38	19.28	25.00	19.02	28.13	21.78	25.00	39.91	21.88	1.96	1.41	2.25	2.70	1.63
Non-MSA AA	330	45.14	17.89	13.94	16.61	21.52	20.43	25.76	45.07	37.88	11.7	8.49	7.74	16.2	12.8

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchased by Bank.

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: State of West Virginia						Evaluation Period: January 1, 2003 TO December 31, 2006							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families* **	% BANK Loans*** *	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
Charleston AA	928	27.37	18.91	8.41	16.87	16.25	20.28	26.25	43.94	49.09	4.98	4.65	5.54	4.85	4.89
Limited Review:															
Huntington AA	311	9.17	22.95	6.71	17.81	20.81	20.14	27.52	39.11	44.97	3.59	4.69	4.61	4.52	2.67
Morgantown AA	687	20.26	18.60	7.39	17.16	15.99	19.68	22.62	44.57	54.00	11.3	13.8	11.6	12.0	10.6
Parkersburg AA	134	3.95	19.28	12.88	19.02	16.67	21.78	26.52	39.91	43.94	2.01	3.11	0.78	3.17	1.51
Non-MSA AA	1,331	39.25	17.89	7.14	16.61	17.58	20.43	25.32	45.07	48.38	11.3	13.8	13.5	12.8	9.72

* Based on 2005 Peer Mortgage Data: Eastern Region.

** As a percentage of loans with borrower income information available. No information was available for 4.4% of loans originated and purchased by Bank.

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: State of West Virginia		Evaluation Period: January 1, 2003 TO December 31, 2006			
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:									
Charleston AA	1,365	40.60	62.18	51.14	79.71	9.30	10.99	6.82	8.54
Limited Review:									
Huntington AA	325	9.67	61.29	69.23	89.54	4.31	6.15	4.11	7.92
Morgantown AA	519	15.44	62.46	71.10	85.36	5.78	8.86	6.61	9.31
Parkersburg AA	143	4.25	62.95	67.83	76.22	15.38	8.39	2.05	3.39
Non-MSA AA	1,010	30.04	56.48	73.56	86.14	7.62	6.24	7.59	12.79

* Based on 2005 Peer Small Business Data: US.

** 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- Year).

**** 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 5.74% of small loans to businesses originated and purchased by the Bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: State of West Virginia			Evaluation Period: January 1, 2003 TO December 31, 2006				
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:									
Charleston AA	1	8.33	91.25	100.0	100.0	0.00	0.00	0.00	0.00
Limited Review:									
Huntington AA	1	8.33	93.33	100.0	100.0	0.00	0.00	10.00	12.50
Morgantown AA	2	16.67	92.68	100.0	100.0	0.00	0.00	0.00	0.00
Parkersburg AA	0	0.00	95.40	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA AA	8	66.67	92.48	100.0	100.0	0.00	0.00	5.56	6.67

* Based on 2005 Peer Small Business Data: US.

** 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-Year).

**** 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 3.51% of small loans to farms originated and purchased by Bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: State of West Virginia			Evaluation Period: January 1, 2003 TO December 31, 2006				
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:									
Charleston AA	0	0	25	1,147	25	1,147	16.90%	2	467
Limited Review:									
Huntington AA	1	32	9	853	10	885	13.04%	2	282
Morgantown AA	0	0	11	1,526	11	1,526	22.48%	0	0
Parkersburg AA	1	193	6	3	7	196	2.89%	0	0
Non-MSA AA	0	0	26	442	26	442	6.51%	1	145
							0.00%		
Statewide/Regional with Potential Benefit to One or More AAs	3	838	1	25	4	863	12.71%	1	475
Broader Regional Investments with No Potential Benefit to the AA	0	0	4	1,729	4	1,729	25.47%	2	164

* '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: State of West Virginia Evaluation Period: January 1, 2003 TO December 31, 2006																		
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:																		
Charleston AA	27.41	8	26.67	25.00	12.50	50.00	12.50	0	0	0	0	0	0	0.57	8.69	63.45	27.30	
Limited Review:																		
Huntington AA	9.16	3	10.00	33.33	0.00	33.33	33.33	1	0	0	0	0	+1	3.89	21.82	51.12	23.18	
Morgantown AA	23.33	5	16.67	0.00	20.00	60.00	20.00	0	0	0	0	0	0	0.00	19.06	39.09	41.85	
Parkersburg AA	6.11	1	3.33	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	14.19	71.22	14.59	
Non-MSA AA	33.99	13	43.33	0.00	15.38	69.23	15.38	0	1	0	0	-1	0	0.00	3.16	73.96	22.87	